

# WANDSWORTH

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## Equality Impact Needs Assessment

Local Plan Publication (Regulation 19) Version  
January 2022



## SSA EQUALITY IMPACT AND NEEDS ANALYSIS

<b>Directorate</b>	Environment and Community Services
<b>Service Area</b>	Planning Policy and Design
<b>Service/policy/function being assessed</b>	Wandsworth Local Plan – Regulation 19 version.
<b>Which borough (s) does the service/policy apply to</b>	Wandsworth
<b>Staff involved</b>	Adam Hutchings, Andrea Kitzberger-Smith
<b>Date approved by Directorate Equality Group (if applicable)</b>	N/A
<b>Date approved by Policy and Review Manager</b> All EINAs must be signed off by the Policy and Review Manager	12 August 2021
<b>Date submitted to Directors' Board</b>	Submitted to Leader's meeting 13 August 2021

### SUMMARY

The Council's new Local Plan will set out policies and guidance for the development of the borough over the plan period of 2023 to 2038. The new Local Plan will also protect and enhance other aspects of life in Wandsworth - its culture, community, heritage and character, open space, quality parks, schools, neighbourhood character and thriving small businesses.

The policies within the Local Plan promote equality and inclusivity for all. This assessment has identified several positive impacts for the various protected characteristics. Children and younger people benefit from policies enhancing open spaces and play spaces, encouraging an active and healthy lifestyle. The elderly population are more susceptible to health issues and likely to suffer from social isolation and therefore benefit from policies which improve the standards of Community and Social Infrastructure, promote Health and Wellbeing and protect open spaces and local shops. Transport policy has a positive impact on several protected groups, particularly those on a lower income, such as: young people, older people, women and people from a BAME background. Disabled residents benefit from Local Plan policies guaranteeing specialist housing, accessible and inclusive urban design and disabled parking spaces. For the LGBT group, some Local Plan policies are considered to have a positive impact, for example the Urban Design policy promotes safety and accessibility and asks that developers minimise opportunities for crime and antisocial behavior. Pregnant women and those on maternity benefit from policies regarding the accessibility of transport and ensuring a mix of housing types and sizes. The Community and Social Infrastructure policy has a positive impact on religious groups. The Night-Time economy policy has a requirement for access, inclusion and safety measures which could help protect vulnerable groups such as Women, LGBTQ, and religious groups e.g., Muslims who are at a higher risk of hate crimes and harassment.

Inevitably there are aspects of the Local Plan’s policies that could possibly have a negative impact on some protected groups. In the current Covid-19 context, there is a risk that community facilities could be priced out by other uses which have higher land values, to the detriment of young people, older residents and religious groups. There is potential for minor conflict between preserving the features of heritage assets and the need to make adaptations to listed buildings to meet the needs of disabled residents. Appropriate mitigation measures have been listed in this assessment to prevent any of these issues from having a significant impact on the protected groups.

This assessment has been updated from the first assessment which was completed for the previous Regulation 18 version of the Local Plan. The assessment has been informed by the public consultation of the Regulation 18 version of the Plan to inform the Regulation 19 version of the Plan which is scheduled for public consultation in Winter 2021/22.

## **1. Background**

### **Briefly describe the service/policy or function:**

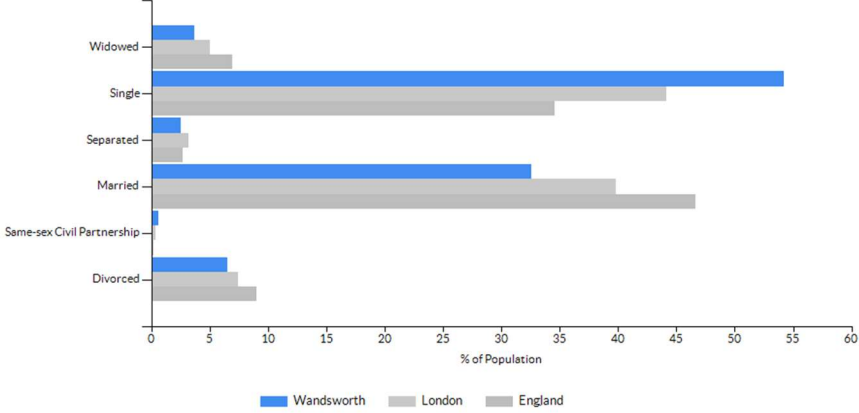
This document is the second stage in the process of developing a new Local Plan, known as the Regulation 19 stage or publication version. This draft Local Plan outlines the Council’s new spatial strategy, vision, and objectives together with the area strategies and policies to deliver the spatial strategy.

The new Local Plan, once adopted, will replace the existing Local Plan which consists of the Core Strategy (2016), Development Management Policies Document (2016), Site Specific Allocations Document (2016) and the adopted Local Plan Employment and Industry document (2018) in a single new Local Plan Document.

## **2. Analysis of need and impact**

Protected group	Findings																																																																												
Age	<p style="text-align: center;"><b>Age group breakdown estimates (2017)</b></p> <table border="1"> <caption>Estimated data from the chart</caption> <thead> <tr> <th>Age Group</th> <th>Wandsworth (%)</th> <th>London (%)</th> <th>England (%)</th> </tr> </thead> <tbody> <tr><td>0 - 4</td><td>6.8</td><td>6.8</td><td>6.8</td></tr> <tr><td>5 - 9</td><td>5.8</td><td>6.5</td><td>6.5</td></tr> <tr><td>10 - 14</td><td>4.5</td><td>5.5</td><td>5.5</td></tr> <tr><td>15 - 19</td><td>3.8</td><td>5.2</td><td>5.2</td></tr> <tr><td>20 - 24</td><td>6.0</td><td>6.8</td><td>6.8</td></tr> <tr><td>25 - 29</td><td>12.5</td><td>9.0</td><td>9.0</td></tr> <tr><td>30 - 34</td><td>13.5</td><td>9.5</td><td>9.5</td></tr> <tr><td>35 - 39</td><td>10.5</td><td>8.5</td><td>8.5</td></tr> <tr><td>40 - 44</td><td>7.2</td><td>7.5</td><td>7.5</td></tr> <tr><td>45 - 49</td><td>6.5</td><td>7.0</td><td>7.0</td></tr> <tr><td>50 - 54</td><td>5.5</td><td>6.8</td><td>6.8</td></tr> <tr><td>55 - 59</td><td>4.2</td><td>6.5</td><td>6.5</td></tr> <tr><td>60 - 64</td><td>3.5</td><td>5.5</td><td>5.5</td></tr> <tr><td>65 - 69</td><td>2.8</td><td>5.0</td><td>5.0</td></tr> <tr><td>70 - 74</td><td>2.2</td><td>4.5</td><td>4.5</td></tr> <tr><td>75 - 79</td><td>1.8</td><td>3.5</td><td>3.5</td></tr> <tr><td>80 - 84</td><td>1.5</td><td>2.5</td><td>2.5</td></tr> <tr><td>85 and over</td><td>1.2</td><td>2.2</td><td>2.2</td></tr> </tbody> </table> <p>Source: ONS*</p> <ul style="list-style-type: none"> <li>- One in three children leaving primary school aged 10-11 years are overweight or obese. The Local Plan policies consider the needs of children and younger people by encouraging physical activity, healthier lifestyles and protecting open spaces and play spaces. The social and community infrastructure policy (LP17) promotes community facilities such as youth clubs, which would also be engaging this age group.</li> <li>- Younger people are less likely to own a car and generally walk, cycle or use public transport, so policies promoting sustainable transport (LP49) methods benefit them.</li> <li>- For younger people wishing to enter the workforce, the Local Employment and Training Opportunities policy (LP39) will have a positive impact as it promotes the generation of local opportunities. The policies of the Building a Strong Economy chapter also protect employment floorspace and require intensification of existing.</li> <li>- The proportion of population in 20s and 30s is significantly higher than average in London and England. With the growing population there is a need for affordable housing (LP23) as property to rent or buy in Wandsworth is in very high demand.</li> <li>- There is a growing elderly population as a result of improvement to life expectancy. There is likely to be an increase in need of specialist housing options due to higher levels of disability and health issues amongst older people. The design (LP1) and housing policies (LP24, LP27, LP31) of the Local Plan ensure that developments achieve the highest standards of accessible and inclusive design and that a good mix of housing sizes are available.</li> <li>- Over a third of people aged over 65 are living alone, which increases the risk of social isolation. The Local Plan considers the needs of older people through its Health and Wellbeing (LP15), as well as Social and Community Infrastructure (LP17) policies, which are intended to ensure that facilities and services are adequate, accessible, support residents needs and encourages social interaction.</li> <li>- Older people are usually reliant on public transport and tend to travel shorter distances. Transport policies (LP49, LP52) that seek to ensure high</li> </ul>	Age Group	Wandsworth (%)	London (%)	England (%)	0 - 4	6.8	6.8	6.8	5 - 9	5.8	6.5	6.5	10 - 14	4.5	5.5	5.5	15 - 19	3.8	5.2	5.2	20 - 24	6.0	6.8	6.8	25 - 29	12.5	9.0	9.0	30 - 34	13.5	9.5	9.5	35 - 39	10.5	8.5	8.5	40 - 44	7.2	7.5	7.5	45 - 49	6.5	7.0	7.0	50 - 54	5.5	6.8	6.8	55 - 59	4.2	6.5	6.5	60 - 64	3.5	5.5	5.5	65 - 69	2.8	5.0	5.0	70 - 74	2.2	4.5	4.5	75 - 79	1.8	3.5	3.5	80 - 84	1.5	2.5	2.5	85 and over	1.2	2.2	2.2
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Protected group	Findings
	<p>standards of accessible transport and protect local shops (LP44, LP47) will satisfy the needs of the elderly.</p> <p>Source: <a href="https://www.datawand.info/jsna/">https://www.datawand.info/jsna/</a></p>
<b>Disability</b>	<ul style="list-style-type: none"> <li>- An estimated 11.2% of the Wandsworth population has a long-term health problem or disability affecting day to day activities. To put this into perspective, the figure is 14.1% in London and 17.6% in England. Wandsworth has a smaller proportion of residents with a long-term condition or disability than London and England.</li> <li>- Disabled residents generally have specialist housing needs, which have been considered in the Local Plan's Housing policies (LP31). There are also requirements for a proportion of housing to be accessible, adaptable and wheelchair user friendly, ensuring the availability of an adequate choice of accessible housing options.</li> <li>- The Local Plan's Design-led approach policy (LP1) states the built environment should achieve the highest standards of accessible and inclusive design, to ensure that all residents are able to move around freely irrespective of ability.</li> <li>- The Local Plan policy (LP51) ensure that when a development has parking facilities that a minimum number are reserved for disabled residents and are placed in suitable locations to ensure accessibility.</li> <li>- Transport policies (LP49) that seek to ensure high standards of accessible transport and protect local shops (LP44) will meet the needs of disabled residents.</li> </ul> <p>Source: <a href="https://www.datawand.info/equalities/">https://www.datawand.info/equalities/</a></p>
<b>Gender (sex)</b>	<ul style="list-style-type: none"> <li>- The gender split in the borough is almost equal, at 48.12% Men and 51.88% women.</li> <li>- Women generally have lower levels of access to private cars and are more reliant on public transport and other methods of transport. Transport policies (LP50, LP52) have a positive impact on this group.</li> <li>- Women tend to have childcare responsibilities more often than men. The Local Plan's town centre policies (LP42) protect and enhance the borough's hierarchy of centres. This would have a positive impact on women as local shops and parades are convenient for buying necessities and do not require much travel.</li> </ul> <p>Source: <a href="https://www.datawand.info/equalities/">https://www.datawand.info/equalities/</a></p>
<b>Gender reassignment</b>	<ul style="list-style-type: none"> <li>- Borough-level data on Gender Reassignment is sparse.</li> <li>- It is known that the Trans community experience disproportionate levels of discrimination. A National LGBT Survey conducted by the Government Equalities Office highlighted a number of concerns regarding safety. Over half of trans respondents admitted that they tried not to be openly trans because of how people behave towards them.</li> <li>- The Design-Led Approach policy (LP1) promotes safety and accessibility and asks that developers minimise opportunities for crime and antisocial behaviour, this will have a positive impact on Trans people and help them to feel safer on a day-to-day basis.</li> </ul> <p>Source: National LGBT Survey  <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/730417/lgbt-survey-easy-read-lo-res_v2.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/730417/lgbt-survey-easy-read-lo-res_v2.pdf</a></p>

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<p><b>Marriage and civil partnership</b></p>	<p style="text-align: center;"><b>Marital and Civil Partnership Status (2011)</b></p>  <table border="1" data-bbox="491 331 1353 741"> <caption>Marital and Civil Partnership Status (2011) - % of Population</caption> <thead> <tr> <th>Status</th> <th>Wandsworth</th> <th>London</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>Widowed</td> <td>~4%</td> <td>~5%</td> <td>~6%</td> </tr> <tr> <td>Single</td> <td>~55%</td> <td>~35%</td> <td>~45%</td> </tr> <tr> <td>Separated</td> <td>~2%</td> <td>~3%</td> <td>~4%</td> </tr> <tr> <td>Married</td> <td>~33%</td> <td>~40%</td> <td>~47%</td> </tr> <tr> <td>Same-sex Civil Partnership</td> <td>~1%</td> <td>~1%</td> <td>~1%</td> </tr> <tr> <td>Divorced</td> <td>~6%</td> <td>~8%</td> <td>~9%</td> </tr> </tbody> </table> <p>Source: 2011 Census data, ONS</p> <ul style="list-style-type: none"> <li>- Those within this category are not considered to be affected differently by the policies within the Local Plan.</li> </ul>	Status	Wandsworth	London	England	Widowed	~4%	~5%	~6%	Single	~55%	~35%	~45%	Separated	~2%	~3%	~4%	Married	~33%	~40%	~47%	Same-sex Civil Partnership	~1%	~1%	~1%	Divorced	~6%	~8%	~9%
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<p><b>Pregnancy and maternity</b></p>	<ul style="list-style-type: none"> <li>- Women generally have lower levels of access to private cars and are more reliant on public transport and other methods of transport. Transport policies (LP50, LP52) have a positive impact on this group.</li> <li>- Pregnant women and their growing families require adequate space. Housing policy (LP24) that ensure an adequate mix of housing types and sizes will be beneficial to this protected group.</li> </ul>																												
<p><b>Race / ethnicity</b></p>	<ul style="list-style-type: none"> <li>- 28.6% of the borough's population (87,779 residents) are of Black, Asian and Minority Ethnic (BAME) background. Wandsworth is less ethnically diverse than London (40.2% BAME), but significantly more diverse than England (14.6% BAME).</li> <li>- The ethnic group profile of the borough is as follows:             <ul style="list-style-type: none"> <li>• Asian/Asian British 10.9%</li> <li>• Black/African/Caribbean/Black British 10.7%</li> <li>• Mixed/multiple ethnic groups 5%</li> <li>• Other ethnic groups 2.1%</li> <li>• White 71.4%</li> </ul> </li> <li>- There is a significant difference between employment rates of different racial groups. 83.7% of the white population are employed, compared to 71% of ethnic minorities. Ethnic minorities generally have lower income levels than their white counterparts. This has several implications in terms of policy and the needs of BAME people.</li> <li>- Policies that encourage the creation of jobs have a positive impact on BAME people with higher rates of unemployment (LP33, LP34, LP35, LP37, LP38, LP39).</li> <li>- BAME people are generally on a lower income and therefore benefit from Housing Policies that encourage affordable housing (LP23).</li> <li>- Ethnic minorities are more likely to have issues accessing suitable housing and to have overcrowded homes due to living with extended family. Housing policy (LP24) that seek to ensure an adequate mix of Housing types and sizes is considered to provide benefits for BAME residents.</li> </ul> <p>Source <a href="https://www.datawand.info/equalities/">https://www.datawand.info/equalities/</a></p>																												

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<p><b>Religion and belief, including non-belief</b></p>	<ul style="list-style-type: none"> <li>- There are a range of religions and beliefs in the borough. The below table from the 2011 census shows the expressed religious denominations of residents of Wandsworth in comparison to London and England.</li> </ul> <p>Religion and belief in Wandsworth (2011)   Data</p> <table border="1" data-bbox="432 427 1394 898"> <thead> <tr> <th></th> <th>Wandsworth</th> <th>London</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>Christian 2011 ⓘ</td> <td>53</td> <td>48.4</td> <td>59.4</td> </tr> <tr> <td>Muslim 2011 ⓘ</td> <td>8.1</td> <td>12.4</td> <td>5</td> </tr> <tr> <td>Hindu 2011 ⓘ</td> <td>2.1</td> <td>5</td> <td>1.5</td> </tr> <tr> <td>Jewish 2011 ⓘ</td> <td>.5</td> <td>1.8</td> <td>.5</td> </tr> <tr> <td>Sikh 2011 ⓘ</td> <td>.3</td> <td>1.5</td> <td>.8</td> </tr> <tr> <td>Buddhist 2011 ⓘ</td> <td>.8</td> <td>1</td> <td>.5</td> </tr> <tr> <td>Other religion 2011 ⓘ</td> <td>.4</td> <td>.6</td> <td>.4</td> </tr> <tr> <td>Religion not stated 2011 ⓘ</td> <td>7.9</td> <td>8.5</td> <td>7.2</td> </tr> <tr> <td>No religion 2011 ⓘ</td> <td>27</td> <td>20.7</td> <td>24.7</td> </tr> </tbody> </table> <ul style="list-style-type: none"> <li>- The Social and Community Infrastructure policy (LP17) states that the Council will work to ensure that adequate, high quality social and community facilities and services are developed and/or modernised to meet the changing needs of the community. This will have a positive impact on faith groups as this policy encompasses faith facilities and religious meeting places.</li> </ul> <p>Source <a href="https://www.datawand.info/equalities/">https://www.datawand.info/equalities/</a></p>		Wandsworth	London	England	Christian 2011 ⓘ	53	48.4	59.4	Muslim 2011 ⓘ	8.1	12.4	5	Hindu 2011 ⓘ	2.1	5	1.5	Jewish 2011 ⓘ	.5	1.8	.5	Sikh 2011 ⓘ	.3	1.5	.8	Buddhist 2011 ⓘ	.8	1	.5	Other religion 2011 ⓘ	.4	.6	.4	Religion not stated 2011 ⓘ	7.9	8.5	7.2	No religion 2011 ⓘ	27	20.7	24.7
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<p><b>Sexual orientation</b></p>	<ul style="list-style-type: none"> <li>- Borough-level data on Sexual Orientation is sparse.</li> <li>- It is known that the LGBTQ community experience disproportionate levels of discrimination.</li> <li>- A National LGBT Survey was conducted by the Government Equalities Office: 4 out of 10 respondents said they'd had a bad experience outside their home in the last 12 months because they were LGBT and Over 2 thirds of the respondents said they didn't hold hands with their partner in public because they were frightened about what people might say.</li> <li>- The Design-Led Approach policy (LP1) promotes safety and accessibility and asks that developers minimise opportunities for crime and antisocial behaviour, this will have a positive impact on the LGBT community and help them to feel safer on a day-to-day basis.</li> </ul> <p>Source National LGBT Survey:  <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/730417/lgbt-survey-easy-read-lo-res_v2.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/730417/lgbt-survey-easy-read-lo-res_v2.pdf</a></p>																																								

**Data gaps.**

Data gap(s)	How will this be addressed?
Borough-level data on the LGBTQ community is sparse.	By using national data to assess need and impact.

More accurate and reliable data on the proportion of the population that is lesbian, gay, bi-sexual or transgender has been gathered for the first time in this year's Census, where members of the public

have been asked to provide information about their sexual orientation and gender identity. Information and data from the Census, once made available by the Office of National Statistics, will be analysed and used to inform future policy making and decisions.

**3. Impact**

<b>Protected group</b>	<b>Positive</b>	<b>Negative</b>
<b>Age</b>	<ul style="list-style-type: none"> <li>- Families with children, young people living in HMO’s and the elderly benefit from policy LP1 (The Design-led Approach) safeguarding amenity.</li> <li>- The elderly, who often have mobility issues, would benefit from the accessible design of developments as per LP2 (General Development Principles).</li> <li>- Policy LP5 (Residential Extensions and Alterations) has a positive impact on families with young children and the elderly who may need to make adaptations to their home or create more space to facilitate changing circumstances.</li> <li>- Policies that encourage development and provision of affordable housing (LP23) have a positive impact on the largest age group in Wandsworth, people in their 20s and 30s, due to increased housing demand.</li> <li>- LP14 (Air Quality and Pollution) has a positive impact on all age groups, but in particular on the elderly, as it ensures development proposals do not have detrimental effects on resident’s health.</li> <li>- The Social and Community Infrastructure policy (LP17) has a positive impact on several age groups. Younger residents benefit from education, training, social and leisure facilities e.g., youth clubs. Similarly, community facilities that are accessible and have good</li> </ul>	<ul style="list-style-type: none"> <li>- The Local Plan acknowledges that there is a deficiency in terms of community facilities (LP17). In the current Covid-19 context, there is a risk that community facilities could be priced out by other uses which have higher land values, to the detriment of young and older residents that rely on them. In order to mitigate this risk, the Council should ensure the Infrastructure Needs Assessment and Delivery Plan is regularly updated and monitored closely to keep track of current stock of social and community facilities. The Council can also seek section 106 planning obligations to ensure proposed developments meet demand on existing community infrastructure and services.</li> </ul>



Protected group	Positive	Negative
	<p>transport links have a positive impact on the elderly.</p> <ul style="list-style-type: none"> <li>- LP19 (Play Space) and LP54 (Open Space, Sport and Recreation) has a positive impact on children and young people in regard to physical health, wellbeing and development.</li> <li>- LP20 (New Open Space) and LP21 (Allotments and Food Growing Spaces), and LP54 (Open Space, Sport and Recreation) encourage active living and provide important physical, psychological and social health benefits for older people.</li> <li>- LP27 (Housing Standards) has a positive impact on older people, who often have mobility issues, as it states that housing must be designed to be inclusive and accessible to all. New buildings must be well insulated and ventilated to avoid any health problems as a result of damp, heat and cold.</li> <li>- Mixed use development (LP35) has a positive impact on older people with mobility issues who would benefit from having a variety of facilities in close proximity, in an area with good transport links,</li> <li>- Young people wishing to enter the workforce will benefit from training, apprenticeship opportunities and local employment through policy LP39.</li> <li>- Transport policies (LP49-LP52) ensure that public transport is widespread and accessible, as well as encourage healthier methods such as walking and cycling, are beneficial to the elderly population.</li> </ul>	
<b>Disability</b>	<ul style="list-style-type: none"> <li>- Policy LP2 (General Development Principles) has a positive impact on people with disabilities as it</li> </ul>	<ul style="list-style-type: none"> <li>- Policy LP3 (The Historic Environment) states that proposals conserve features that contribute to the</li> </ul>

Protected group	Positive	Negative
	<p>specifies that developments should consider permeability, street widths and should be designed to be accessible and inclusive to all.</p> <ul style="list-style-type: none"> <li>- Policy LP5 (Residential Extensions and Alterations) is useful for disabled people as it allows for adaptations to be made to the home.</li> <li>- Community facilities that are accessible and have good transport links have a positive impact on disabled residents (LP17 – Social and Community Infrastructure).</li> <li>- LP19 (Play Space) has a positive impact on this group as play spaces are designed to be inclusive and provide facilities for children of all abilities.</li> <li>- LP27 (Housing Standards) has a positive impact on disabled people as it states that housing must be designed to be inclusive and accessible to all. New buildings must be well insulated and ventilated to avoid any health problems as a result of damp, heat and cold.</li> <li>- Policy LP28 (Student Accommodation) has a positive impact on disabled people as it guarantees that 10% of student rooms will be easily adaptable for occupation by wheelchair users.</li> <li>- Mixed use development (LP35) has a positive impact on people with mobility issues who would benefit from having a variety of facilities within close proximity, in an area with good transport links.</li> <li>- Local Shops and Services (LP44) are beneficial to people with mobility issues as they are close to home and have the necessities.</li> </ul>	<p>Heritage Asset or Historic Environment’s significance and character. There is potential that there may be a clash between upholding this part of the policy and the need to make adaptations to Listed Buildings in order to meet the needs of disabled people e.g., ramps. The chances of this are low and the council officer assigned to the planning application can exercise their discretion if this was to occur.</p> <ul style="list-style-type: none"> <li>- The Local Plan acknowledges that there is a deficiency in terms of community facilities. In the current Covid-19 context, there is a risk that community facilities could be priced out by other uses which have higher land values, to the detriment of disabled residents that rely on them. In order to mitigate this risk, the Council should ensure the Infrastructure Needs Assessment and Delivery Plan is regularly updated and monitored closely to keep track of current stock of social and community facilities. The Council can also seek section 106 planning obligations to ensure proposed developments meet demand on existing community infrastructure and services.</li> </ul>

Protected group	Positive	Negative
	<ul style="list-style-type: none"> <li>- Evening and Night-Time Economy (LP45) has a positive impact on disabled people as it is supportive of development which improves access for all users including travel to and from venues.</li> <li>- Transport policies (LP49-LP52) that ensure public transport is widespread and accessible are beneficial to disabled residents.</li> <li>- Policy LP51 (Parking, Servicing and Car free Development) ensures that a minimum number of disability-friendly spaces are provided in suitable locations.</li> </ul>	
<p><b>Gender (sex)</b></p>	<ul style="list-style-type: none"> <li>- Women, who most often have caring responsibilities for children, would benefit from accessibility of developments and good local transport links (LP1 – The Design-led Approach and LP2 – General Development Principles)</li> <li>- Policy LP39 (Local Employment and Training Opportunities) promotes local employment opportunities; this will have a positive impact on women who often have caring responsibilities and may need to work part time, as well as close to home.</li> <li>- Local Shops and Services (LP44) are beneficial to women with childcare responsibilities as they are convenient, close to home and do not require long distance travel.</li> <li>- Evening and Night-Time Economy (LP45) has a positive impact on vulnerable groups by requiring access, inclusion and safety measures which could help protect vulnerable groups such as women.</li> <li>- Transport policies (LP49-LP52) that ensure public transport is widespread and accessible have a positive impact on women with childcare responsibilities who are</li> </ul>	<ul style="list-style-type: none"> <li>- There are certain groups that are at a higher risk of hate crimes, harassment and attacks, including women. The Evening and Night-Time Economy policy (LP45) does not include a requirement for developments to contribute to a sense of safety for the people in these vulnerable groups i.e., by providing security features, well-lit walking routes and good surveillance. To mitigate this issue, the Council should work with developers to ensure that they include safety and security measures early in the design process and that these are followed through.</li> </ul>

Protected group	Positive	Negative
	less likely to have access to a car and rely on public transport.	
<b>Gender reassignment</b>	<ul style="list-style-type: none"> <li>- LP1 – The Design-led Approach, has a positive impact on Trans people who experience disproportionate levels of discrimination. It promotes safety and accessibility and asks that developers minimise opportunities for crime and antisocial behaviour, which will help Trans people feel safer in the borough.</li> <li>- Evening and Night-Time Economy (LP45) has a positive impact on vulnerable groups by requiring access, inclusion and safety measures which could help protect vulnerable groups such as the LGBTQ community.</li> <li>- LP17 Social and Community Infrastructure has a positive impact on trans-gender people as it supports inclusive social and community facilities.</li> </ul>	<ul style="list-style-type: none"> <li>- There are certain groups that are at a higher risk of hate crimes, harassment and attacks, including the LGBTQ community. To mitigate this issue, the Council should work with developers to ensure that they include safety and security measures early in the design process and that these are followed through.</li> </ul>
<b>Marriage and civil partnership</b>	<ul style="list-style-type: none"> <li>- Those within this category are not considered to be affected differently by the policies within the Local Plan.</li> </ul>	<ul style="list-style-type: none"> <li>- Those within this category are not considered to be affected differently by the policies within the Local Plan.</li> </ul>
<b>Pregnancy and maternity</b>	<ul style="list-style-type: none"> <li>- Policies (LP5 – Residential Extensions and Alterations and LP6 – Basement and Subterranean Development) positively impact women who are pregnant or on maternity as they allow for extensions to the home to cater to growing/larger families.</li> <li>- The Housing Mix policy (LP24) has a positive impact on people within this category as developers are encouraged to provide a range of home sizes, beneficial to a person with a</li> </ul>	<ul style="list-style-type: none"> <li>- Those within this category are not considered to be negatively affected by the policies within the Local Plan.</li> </ul>

Protected group	Positive	Negative
	<p>family that may need a larger home.</p> <ul style="list-style-type: none"> <li>- Local Shops and Services (LP44) are beneficial to pregnant women as they are convenient, close to home and do not require long distance travel.</li> <li>- LP17 Social and Community Infrastructure has a positive impact on trans-gender people as it supports inclusive social and community facilities</li> </ul>	
<b>Race / ethnicity</b>	<ul style="list-style-type: none"> <li>- Policies that encourage the creation of more homes at an affordable cost - LP23 Affordable Housing, have a positive impact on people from BAME backgrounds who are generally on lower incomes.</li> <li>- The Social and Community Infrastructure policy (LP17) seeks to enhance community infrastructure. Different ethnic groups have different needs and this policy encourages adequate provision of services.</li> <li>- LP20 (New Open Space) encourages active living and provides important physical, psychological and social health benefits for BAME people who generally have worse health outcomes than their white counterparts.</li> <li>- The Housing Mix policy (LP24) has a positive impact on BAME people as it encourages housing developments to provide a range of dwelling sizes. For example, Asian families are more likely to live in an extended family unit so would require more space.</li> <li>- Policy LP32 (Traveller Accommodation) seeks to protect the existing Gypsy and Traveller site at Trewint Street. It has a positive impact on people from this ethnic group,</li> </ul>	<ul style="list-style-type: none"> <li>- There are certain groups that are at a higher risk of hate crimes, harassment and attacks, including ethnic minorities. To mitigate this issue, the Council should work with developers to ensure that they include safety and security measures early in the design process and that these are followed through.</li> </ul>

Protected group	Positive	Negative
	<p>safeguarding their existing site and ensuring that the Council meets their accommodation needs. Should any additional need arise, the Council will identify further facilities to meet the needs of Gypsies and Travellers.</p> <ul style="list-style-type: none"> <li>- BAME people will benefit from training, apprenticeship opportunities and local employment (LP39 – Employment and Training Opportunities).</li> <li>- Evening and Night-Time Economy (LP45) has a positive impact vulnerable groups by requiring access, inclusion and safety measures which could help protect vulnerable groups such as people from BAME backgrounds.</li> </ul>	
<p><b>Religion and belief, including non-belief</b></p>	<ul style="list-style-type: none"> <li>- The Social and Community Infrastructure policy (LP17) seeks to enhance community facilities, which includes religious meeting places. This policy will therefore have a positive impact across different faith groups.</li> <li>- Evening and Night-Time Economy (LP45) has a positive impact vulnerable groups by requiring access, inclusion and safety measures which could help protect vulnerable groups such as religious groups.</li> </ul>	<ul style="list-style-type: none"> <li>- The Local Plan acknowledges that there is a deficiency in terms of community facilities. In the current Covid-19 context, there is a risk that community facilities could be priced out by other uses which have higher land values, to the detriment of religious groups that are dependent on these facilities. In order to mitigate this risk, the Council should ensure the Infrastructure Needs Assessment and Delivery Plan is regularly updated and monitored closely to keep track of current stock of social and community facilities. The Council can also seek section 106 planning obligations to ensure proposed developments meet demand on existing community infrastructure and services.</li> </ul>
<p><b>Sexual orientation</b></p>	<ul style="list-style-type: none"> <li>- The Design-Led Approach (LP1) has a positive impact on LGBT people who experience disproportionate levels of discrimination. It promotes</li> </ul>	<ul style="list-style-type: none"> <li>- There are certain groups that are at a higher risk of hate crimes, harassment and attacks, including the LGBTQ community. The Evening and Night-Time Economy policy (LP45) does not</li> </ul>

Protected group	Positive	Negative
	<p>safety and accessibility and asks that developers minimise opportunities for crime and antisocial behaviour, which will help LGBT people feel safer in the borough.</p> <ul style="list-style-type: none"> <li>- Evening and Night-Time Economy (LP45) has a positive impact vulnerable groups by requiring access, inclusion and safety measures which could help protect vulnerable groups such as the LGBTQ community.</li> </ul>	<p>include a requirement for developments to contribute to a sense of safety for the people in these vulnerable groups i.e., by providing security features, well-lit walking routes and good surveillance. To mitigate this issue, the Council should work with developers to ensure that they include safety and security measures early in the design process and that these are followed through.</p>

#### 4. Actions

Action	Lead Officer	Deadline
When looking at policy LP3 (The Historic Environment) and the protection of features of Heritage Assets, ensure to keep in mind the needs of disabled people who may need adaptations made to buildings to suit their needs.	Local Plan team	Complete
In the context of the Night-Time Economy, the Council should update the policy to require development includes access, inclusion and safety measures. This is important to ensure the safety of Women, LGBTQ, and religious groups e.g., Muslims who are at a higher risk of hate crimes and harassment.	Development Management team	complete
Council to ensure the Infrastructure Needs Assessment and Delivery Plan is regularly updated and monitored closely to keep track of current stock of social and community facilities.	Local Plan team	Ongoing

#### 5. Consultation

Where a significant change is proposed to a service or where a new policy/service/service specification is being developed it is best practice to consult on the draft findings of an ENIA in order to identify if any impact or need has been missed.

There will be a further 6-week public consultation for the Local Plan commencing in Winter 2021/22. This Equality Impact and Needs Analysis will form part of that consultation and findings will be incorporated into it. The Plan will then be submitted to the Secretary of State for Examination in Public.

For more information write to:  
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