WANDSWORTH

Equality Impact and Needs Analysis

Local Plan Regulation 18 Consultation Version November 2020



SSA EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	Environment and Community Services
Service Area	Planning Policy and Design
Service/policy/function being assessed	Wandsworth Local Plan
Which borough (s) does the service/policy	Wandsworth
apply to	
Staff involved	Okorite Amachree, Andrea Kitzberger-
	Smith
Date approved by Directorate Equality	N/A
Group (if applicable)	
Date approved by Policy and Review	9 October 2020
Manager	
All EINAs must be signed off by the Policy	
and Review Manager	
Date submitted to Directors' Board	6 October 2020

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.

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. Additionally, the Evening and Night-Time economy policy of the Local Plan does not have a requirement for safety measures which could help protect vulnerable groups such as: women, the LGBT community and Muslims. Appropriate mitigation measures have been listed in this assessment to prevent any of these issues from having a significant impact on the protected groups.

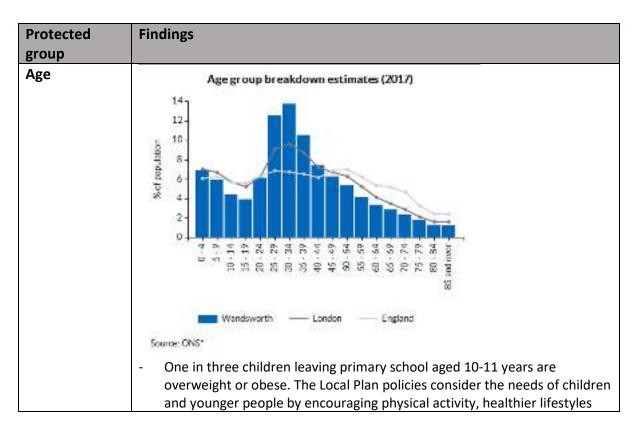
1. Background

Briefly describe the service/policy or function:

This document is the first stage in the process of developing a new Local Plan, known as the Regulation 18 stage or pre-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	Findings	
group		
group	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. Younger people are less likely to own a car and generally walk, cycle or use public transport, so policies promoting sustainable transport (LP51) methods benefit them. For younger people wishing to enter the workforce, the Local Employment and Training Opportunities policy (LP42) will have a positive impact as it promotes the generation of local opportunities. 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 (LP25) as property to rent or buy in Wandsworth is in very high demand. 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 (LP26, LP29, LP33) 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. 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. Older people are usually reliant on public transport and tend to travel shorter distances. Transport policies (LP51, LP54) that seek to ensure high standards of accessible transport and protect local shops (LP44, LP47) will satisfy the needs of the elderly.	
	Source: https://www.datawand.info/jsna/	
Disability	 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. Disabled residents generally have specialist housing needs, which have been considered in the Local Plan's Housing policies (LP33). 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. The Local Plan's Urban Design 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. The Local Plan policy (LP53) 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. 	

Protected	Findings		
group			
	 Transport policies (LP52) that seek to ensure high standards of accessible transport and protect local shops (LP44) will meet the needs of disabled residents. 		
	Source: https://www.datawand.info/equalities/		
Gender (sex)	 The gender split in the borough is almost equal, at 48.12% Men and 51.88% women. Women generally have lower levels of access to private cars and are more reliant on public transport and other methods of transport. Transport policies (LP52, LP54) have a positive impact on this group. Women tend to have childcare responsibilities more often than men. The 		
	Local Plan's town centre policies (LP44) 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. Source: https://www.datawand.info/equalities/		
Gender	- Borough-level data on Gender Reassignment is sparse.		
reassignment	 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. The Urban Design 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. 		
	Source: National LGBT Survey		
	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/		
Marriage and	attachment_data/file/730417/lgbt-survey-easy-read-lo-res_v2.pdf		
civil	Marital and Civil Partnership Status (2011)		
partnership	Midmed - Separatel		
	Some and Dell former only-		
	Dr. broad—		
	5 12 N St St W 00 00 AZ EN ST N 4		
	Program 2011 Construction CMP		
	- Those within this category are not considered to be affected differently by the policies within the Local Plan.		
Pregnancy and maternity	- Women generally have lower levels of access to private cars and are more reliant on public transport and other methods of transport. Transport policies (LP52, LP54) have a positive impact on this group.		

Protected	Findings			
Race / ethnicity	Mixed/multipleOther ethnic gr	nsure an adequate mix of sprotected group. ulation (87,779 residents background. Wandswor BAME), but significantly the borough is as follows tish 10.9% faribbean/Black British 10 ethnic groups 5%	of housing types i) are of Black, A th is less ethnic more diverse the	and Asian ally
Religion and belief, including non-	 White 71.4% There is a significant difference between employment rates of racial groups. 83.7% of the white population are employed, co 71% of ethnic minorities. Ethnic minorities generally have lowed levels than their white counterparts. This has several implication of policy and the needs of BAME people. Policies that encourage the creation of jobs have a positive immand BAME people with higher rates of unemployment (LP36, Lp37, LP40, LP41). BAME people are generally on a lower income and therefore be Housing Policies that encourage affordable housing (LP25). Ethnic minorities are more likely to have issues accessing suital and to have overcrowded homes due to living with extended for Housing policy (LP26) that seek to ensure an adequate mix of types and sizes is considered to provide benefits for BAME resistant source https://www.datawand.info/equalities/ There are a range of religions and beliefs in the borough. The form the 2011 census shows the expressed religious denomination. 		ployed, compare have lower incompared in the lower i	mpared to er income ons in terms oact on LP38, LP39, enefit from ble housing amily. Housing dents.
belief	Religion and helled is fiberdesports (20)	Wayshowsells	(Andrea	rengt.
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	- The Social and Community I Council will work to ensure community facilities and ser	that adequate, high qual	ity social and	

Protected	Findings	
group		
	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. Source https://www.datawand.info/equalities/	
Sexual	- Borough-level data on Sexual Orientation is sparse.	
orientation	 It is known that the LGBTQ community experience disproportionate levels of discrimination. 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. The Urban Design 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. 	
	Source National LGBT Survey: https://assets.publishing.service.gov.uk/government/uploads/system/uploads	
	/attachment_data/file/730417/lgbt-survey-easy-read-lo-res_v2.pdf	

Data gaps.

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

3. Impact

Protected	Positive	Negative
group		
Age	 Families with children, young people living in HMO's and the elderly benefit from policy LP1 (Urban Design) safeguarding amenity. The elderly, who often have mobility issues, would benefit from the accessible design of developments as per LP2 (General Development Principles). 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 	- 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

Protected	Positive	Negative
group		
	create more space to facilitate	demand on existing community
	changing circumstances.	infrastructure and services.
	- Policies that encourage	
	development and provision of	
	affordable housing (LP25) have a	
	positive impact on the largest	
	age group in Wandsworth,	
	people in their 20s and 30s, due	
	to increased housing demand.	
	- 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.	
	- 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	
	transport links have a positive	
	impact on the elderly.	
	- LP19 (Play Space) and LP56	
	(Open Space, Sport and	
	Recreation) has a positive impact	
	on children and young people in	
	regard to physical health,	
	wellbeing and development.	
	- LP20 (New Open Space) and	
	LP21 (Allotments and Food	
	Growing Spaces), and LP56	
	(Open Space, Sport and	
	Recreation) encourage active	
	living and provide important	
	physical, psychological and social	
	health benefits for older people.	
	- LP29 (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	

Protected	Positive	Negative
group		
	problems as a result of damp, heat and cold. Mixed use development (LP38) 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, Young people wishing to enter the workforce will benefit from training, apprenticeship opportunities and local employment through policy LP42. Transport policies (LP51, LP52 and LP54) 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. Policy LP2 (General Development Principles) has a positive impact on people with disabilities as it specifies that developments should consider permeability, street widths and should be designed to be accessible and inclusive to all. Policy LP5 (Residential Extensions and Alterations) is useful for disabled people as it allows for adaptations to be made to the home. Community facilities that are accessible and have good transport links have a positive impact on disabled residents (LP17 – Social and Community Infrastructure).	- Policy LP3 (The Historic Environment) states that proposals conserve features that contribute to the 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 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
	impact on disabled residents (LP17 – Social and Community	there is a deficiency in terms of community facilities. In the current

Protected	Positive	Negative
group		
group	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. Policy LP30 (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. Mixed use development (LP38) 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. Parades of Local Importance (LP44) are beneficial to people with mobility issues as they are close to home and have the necessities. Transport policies (LP51, LP52 and LP54) that ensure public transport is widespread and accessible are beneficial to disabled residents. Policy LP53 (Parking, Servicing and Car free Development) ensures that a minimum number of disability-friendly spaces are provided in suitable locations.	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. - Policy LP48 (Evening and Night-Time Economy) does not explicitly mention the need to ensure developments are accessible to all. The risk of this having an impact on disabled people is low, as accessibility is covered by policy LP2 (General Development Principles) requiring developments to achieve the highest standards of inclusive design.
Gender (sex)	- Women, who most often have caring responsibilities for children, would benefit from accessibility of developments and good local transport links (LP1 – Urban Design and LP2 – General Development Principles)	- 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 (LP48) does not include a requirement for developments to contribute to a sense of safety for the
	- Policy LP42 (Local Employment and Training Opportunities) promotes local employment opportunities; this will have a positive impact on women who often have caring responsibilities	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

Protected	Positive	Negative
group		
	and may need to work part time, as well as close to home. - Parades of Local Importance (LP44) and Local Shops (LP47) are beneficial to women with childcare responsibilities as they are convenient, close to home and do not require long distance travel. - Transport policies that ensure public transport is widespread and accessible have a positive impact on women with childcare responsibilities who are less likely to have access to a car and rely on public transport.	measures early in the design process and that these are followed through. Policy LP2 does state that developments should minimize opportunities for crime and antisocial behavior, but extra consideration should be given in the context of protected groups and the Evening and Night-Time Economy.
Gender	- The Urban Design policy (LP2)	- There are certain groups that are at a
reassignme	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.	higher risk of hate crimes, harassment and attacks, including the LGBTQ community. The Evening and Night-Time Economy policy (LP48) 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. Policy LP2 (General Development principles) does state that developments should minimize opportunities for crime and antisocial behavior, but extra consideration should be given in the context of protected groups and the Evening and Night-Time Economy. The National LGBT Survey found that a lot of trans respondents said their needs were not considered when they accessed general healthcare services. The Social and Community Infrastructure policy (LP17) does not state that facilities should be designed to be inclusive to all and this could have a negative impact on the Trans

Protected	Positive	Negative
group		community, who require facilities such as gender-neutral toilets. This impact can be mitigated by adding a line into the policy about inclusivity.
Marriage and civil partnership	Those within this category are not considered to be affected differently by the policies within the Local Plan.	- Those within this category are not considered to be affected differently by the policies within the Local Plan.
Pregnancy and maternity	 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. The Housing Mix policy (LP26) 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 family that may need a larger home. Parades of Local Importance (LP44) and Local Shops (LP47) are beneficial to pregnant women as they are convenient, close to home and do not require long distance travel. 	- The Social and Community Infrastructure policy (LP17) does not state that facilities should be designed to be inclusive to all and this could have a negative impact on the mothers in this category, who may require baby changing facilities. This can be mitigated by adding a line into the policy about inclusivity.
Race / ethnicity	 Policies that encourage the creation of more homes at an affordable cost have a positive impact on people from BAME backgrounds who are generally on lower incomes (LP25) 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. LP20 (New Open Space) encourages active living and provides important physical, psychological and social health benefits for BAME people who 	- There are certain groups that are at a higher risk of hate crimes, harassment and attacks, including ethnic minorities. The Evening and Night-Time Economy policy (LP48) 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. Policy LP2 (General Development Principles) does state that

Protected	Positive	Negative
group	generally have worse health outcomes than their white counterparts. The Housing Mix policy (LP26) 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. Policy LP34 (Gypsy and 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, 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. BAME people will benefit from training, apprenticeship opportunities and local employment (LP42 – Employment and Training Opportunities).	developments should minimize opportunities for crime and antisocial behavior, but extra consideration should be given in the context of protected groups and the Evening and Night-Time Economy.
Religion and belief, including non-belief	- 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.	- 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

4. Actions

Action	Lead Officer	Deadline
Add a line into the Social and Community Infrastructure policy	Local Plan	Complete
(LP17) that emphasises the need for facilities and services to	team	
be designed to be inclusive for all. This is especially important		
in the context of those within the Trans community who may		
require facilities such as gender-neutral toilets, and		
pregnant/maternity women who would need baby changing		
facilities.		
When looking at policy LP3 (The Historic Environment) and	Local Plan	Complete
the protection of features of Heritage Assets, ensure to keep	team	
in mind the needs of disabled people who may need		
adaptations made to buildings to suit their needs.		
In the context of the Night-Time Economy, the Council should	Development	Ongoing
work with developers to ensure that they include safety and	Management	
security measures early in the design process. This is	team	
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.		
Council to ensure the Infrastructure Needs Assessment and	Local Plan	Ongoing
Delivery Plan is regularly updated and monitored closely to	team	
keep track of current stock of social and community facilities.		

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 an 8-week public consultation for the Local Plan commencing on 4 January, 2021. This Equality Impact and Needs Analysis will form part of that consultation and findings will be incorporated into it. There will also be a second round of public consultation set to take place in the latter part of 2021, which will provide an opportunity for this EINA to be revisited.

For more information write to:
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