

Equalities Impact Assessment of the LBRuT Local Development Framework Development Management Development Plan Document

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1 Introduction

- 1.1 This document sets out the Equalities Impact Assessment (EqIA) of the London Borough of Richmond upon Thames (LBRuT) Local Development Framework (LDF) Development Management Development Plan Document (DPD).
- 1.2 The purpose of the EqIA is to highlight the likely impact of the Development Plan Document on the target groups and to take action to improve the policies where appropriate as a result.

2 The Local Development Framework Development Management DPD

- 2.1 The London Borough of Richmond upon Thames' LDF Development Management DPD is now at Pre-Submission Stage, following focussed consultation on the Issues.
- 2.2 The Local Development Framework is being prepared under the terms of the 2004 Planning and Compulsory Purchase Act and will provide a strategic planning framework for the Borough, guiding development to 2016 and beyond. The Local Development Framework is a folder of documents which will gradually replace the saved Unitary Development Plan as the development plan for the Borough, as follows:-
 - The Core Strategy DPD, sets out LBRuT's spatial vision and has 3 inter-related themes of 'A Sustainable Future', 'Protecting Local Character' and 'Meeting People's Needs'. This document was adopted in April 2009
 - The Development Management DPD, takes forward the core Strategy with more detailed policies for the management and control of new development. This document is currently being produced and is the subject of this Equalities Assessment.
 - The Site Allocations DPD – site specific proposals, work due to start on this in 2010.

3 Borough Profile and Characteristics and Key Issues affecting the Borough

- 2.1 Refer to the Equalities Impact Assessment for the Core Strategy for the Borough profile and key issues affecting the Borough. In addition, detailed information on borough characteristics can be found in the Annual Monitoring Report¹.

¹ LBRUT UDP/LDF Annual Monitoring Report for the financial year 2008/9, December 2009 - http://www.richmond.gov.uk/ldf_udp_annual_monitoring_report.

4 Target Groups

- 4.1 The main equality target groups defined in this assessment are: Black and Minority Ethnic People (BME); women; disabled people; younger people; older people; lesbians, gay men and transgender people; and faith groups. The relevant legislation is as follows:
- People from black and minority ethnic backgrounds: – The Race Relations Act 1976; as amended by the Race Relations (Amendment) Act (RRAA) 2000.
 - Disabled people: – The Disability Discrimination Act (DDA) 1995; and DDA 2005, the Disability Discrimination Act (Amendment) Regulations 2003.
 - Human Rights - Human Rights Act 1998.
 - Men and Women:- The Equal Pay Act 1970, Sex Discrimination Act 1975, and Equality Act 2006
 - Sexual Orientation and Religion - The Employment Equality (Sexual Orientation) Regulations 2003; Employment Equality (Religion and Belief) Regulations 2003 and Equality Act 2006
- 2.2 The equality areas, or strands as they are commonly called, are gender, race, disability, age, faith and sexuality. The strands are inclusive of all people.

5 Richmond upon Thames Equality and Diversity Strategy

- 5.1 The Council's Equality and Diversity Strategy document and action plan details how the Council intends to promote equality, value diversity and prevent discrimination through its roles as a service provider, employer and community leader.

The Council's Commitments

- 5.2 The specific commitments from the Equality and Diversity Strategy are detailed as follows:
- We will identify, tackle and prevent any form of institutional discrimination.
 - We will promote equality of opportunity and fair treatment for all our communities.
 - We will build on the strengths of diversity and aim to promote good relations between different communities.
 - We will work with specific groups of people who are hard to reach and who may not have been provided with opportunities to voice their needs. We will particularly work with those groups who experience marginalisation, disadvantage and discrimination to discover previously unmet need.

- We will implement an equalities management framework, which is based on key requirements of the Equality Standard, Race Equality Scheme and the Disability Discrimination Act. This will help us towards our goal of the mainstreaming of equality/diversity considerations and objectives in all the work of the Council.
- We will ensure that all our partners and contractors are informed of our equality/diversity commitments and work towards the adoption of a shared code of practice.
- We will monitor and evaluate all aspects of service delivery and employment to inform our progress, objectives and review of outcomes. We will also initiate changes where necessary.
- We will develop corporate consultation and review mechanisms as part of our commitment to on-going consultation with key stakeholders, partners and community/voluntary groups.
- We will ensure that all Members, managers and staff are clear about their roles and responsibilities under equalities legislation and Council policy and are provided with learning and development opportunities to develop skills, knowledge and competencies to facilitate their roles.

Service delivery

- 5.3 The Council's commitments are also translated through to its particular responsibilities on an ongoing basis in relation to service delivery. The Council's central duty is to provide and enable the provision of appropriate, effective, responsive and sensitive services to the whole community. We will do this by working in partnership with all sections of the community, contractors and local partners to promote the economic, social and environmental well being of the whole community.

6 Findings of the EQIA

Black and Minority Ethnic Groups (BME)

- 6.1 The 2001 census figure for the borough showed that people from minority ethnic backgrounds make up just over 21% of the borough's population; this includes 12% of people from white Irish and white non-British backgrounds and 9% from BME backgrounds.
- 6.2 The main policies which impact on these groups are for Housing, where a choice of housing could benefit overcrowded BME households, as well as Affordable Housing, Housing to meet Specific Needs and Housing Standards which could potentially benefit all equalities groups.
- 6.3 Policies for Social Infrastructure could impact on all groups who may be able to use such facilities.
- 6.4 The promotion of small business units in policy will also particularly help BME communities, as this is traditionally used as a way out of unemployment for such groups.

Women

- 6.5 Women generally have lower levels of access to cars than men and are more likely to travel by bus, whereas men are more likely to travel by train, underground or car. Policies which seek to maintain local employment or local goods and services within walking distance or accessible by public transport will therefore benefit anyone without access to a car for employment or other activities.
- 6.6 Housing and Social Infrastructure policies could potentially benefit all equalities groups as referred to in 6.2 and 6.3 above.
- 6.7 Women will benefit from the policy for Taxis and Private Hire vehicles, which take account of personal security issues. The policy for Walking and the Pedestrian Environment takes account of those with children and buggies.

6.8 Disabled people

- 6.9 The 2001 Census data show that 12.5% of the borough's population has a long term limiting illness and 2.5% of the working age population are permanently sick or disabled and unable to work as a result, although these figures are each significantly lower than the national average. Disabled Londoners comprise 16 per cent of London's working age population².
- 6.10 Across London and the UK, disabled people experience relatively low rates of employment. The employment rate for disabled Londoners is 45%, significantly lower than the rate for non-disabled people of 74%. Disabled workers are also more likely to work part-time than non-disabled workers. In London, 28 per cent of disabled workers are employed on a part-time basis relative to 19 per cent for non-disabled workers³.
- 6.11 This data suggests that initiatives to improve the economy, help small businesses and therefore increase employment opportunities, and measures to increase accessibility to and within workplaces, will have particular benefits for disabled people.
- 6.12 Access to a choice of transport should be made as easy as possible for all users, including those with disabilities. Disabled people will particularly benefit from policies in the DMDPD that improve the accessibility of public transport and the pedestrian environment.
- 6.13 Housing and Social Infrastructure policies could potentially benefit all equalities groups as referred to in 6.2 and 6.3 above. In particular Housing and design policies which highlight the importance of the Lifetime Homes standards and access requirements will ensure that the needs of disabled people are taken into account in the development process.

Younger people

² Disabled people and the labour market in London: Key Facts, DMAG briefing 2007/05.

³ Disabled people and the labour market in London: Key Facts, DMAG briefing 2007/05.

- 6.14 Younger people tend to experience the same issues with transport as other groups but possibly more so during the day when they are more likely to be out rather than late at night. Using public transport and waiting at bus stops and railway stations during the darker winter months are likely to create the same sorts of issues as are experienced by other equality groups. Younger people are more likely to walk or cycle than other groups, so measures that aim to improve walking and cycling for the wider community will also benefit this group.
- 6.15 Younger people are a key group who will benefit from improved play space and open spaces for formal and informal recreation.

Older people

- 6.16 The 2001 Census data suggest that the borough has a relatively high proportion of older persons particularly those aged 85 and over. Older people tend to make fewer journeys and travel shorter distances as they tend to drive less and may be more dependent on public transport.
- 6.17 Many of London's older people experience unacceptably high levels of isolation and poverty. It is necessary to ensure that appropriate housing is provided (various forms of housing for older people as well as support for independent living). To prevent isolation and fear of going out, better street lighting, crime reduction measures, and design of naturally defensive public spaces would be beneficial.
- 6.18 This group would benefit from those proposals in the DMDPD that improve accessibility to public transport including interchange facilities and enhance the pedestrian environment. They would also benefit particularly from improvements to social infrastructure, and increased accessibility to these and to open space.

Lesbians, gay men, bisexuals and transgender people

- 6.19 Safety and security on trains, buses and stations is known to be of concern to people from this group who are often vulnerable to attack. Many of the same situations that apply to women, faith groups, and BME groups also apply to people in this community.

Faith groups

- 6.20 The impact on faith groups of anti-social behaviour tends to relate to visible signs of a person's faith and is often linked to BME groups. Policies in the DMDPD are likely to benefit different faith groups in much the same way as other target groups.

People outside the target groups

- 6.21 These people will benefit from the policies that benefit other groups, especially those relating to health, social inclusion, job opportunities.
- 6.22 Co-location policies may enhance ease of access for users from all groups. Easy access to services locally can have a significant impact on quality of life. A mix of land uses including jobs and amenities can reduce the need to travel. Planning should facilitate and promote sustainable and inclusive patterns of development by ensuring that development supports existing communities and contributes to the

creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.

6.23 Areas of mixed use are likely to result in lower crime rates than areas where single uses dominate, because of natural surveillance and the regular circulation of people. A variety of uses including those likely to be occupied during the working day will help to increase the likelihood of natural surveillance throughout the day

6.24 Appendix 1 sets out in detail the Equalities Assessment for the Development Management Development Plan Document policies.

Appendix 1: Equalities Impact Assessment

Impact of Policies on Equalities Categories

L – Low

M – Medium

H – High

POLICIES	Equalities categories						
POLICY	Race	Gender	Disability	Age	LBG	Religion/ Faith	Commentary
CLIMATE CHANGE MITIGATION POLICIES							
Sustainable Construction	L	L	L	L	L	L	Policies for sustainable buildings are likely to benefit all groups. The provision of energy efficient, healthy homes and workplaces that are warm in winter and cool in summer will increase comfort and reduce costs in occupation.
Renewable energy & Decentralised Energy networks	L	L	L	L	L	L	More energy efficient buildings and reduced Carbon consumption will benefit all groups and promote equality across all the community.
Retrofitting	L	L	L	L	L	L	Compliance with energy and water saving measures and the flood proofing of properties will generate beneficial cost and health savings to all groups.
ADAPTING TO CLIMATE CHANGE POLICIES							
Water infrastructure and resources	L	L	L	L	L	L	This policy protects water quality, resources and supplies and requires high standards of water efficiency. This policy is not relevant for any of the equalities groups.
Adapting to higher temperatures and need for cooling	L	L	L	M	L	L	This policy requires developments to take into account and adapt to higher temperatures to counteract urban heat island effect, avoid and mitigate overheating and excessive heat generation

POLICIES	Equalities categories						
							as well as meet the need for cooling. It also encourages existing developments to maximise opportunities to adapt to changing climate. Elderly people are considered to be more at risk from overheating and therefore this policy has a medium impact (positive) on the “age” category.
Living roofs	L	L	L	L	L	L	This policy requires developers to incorporate living roofs above certain threshold and has no impact on any of the equalities groups.
FLOODING POLICIES							
Local flood risk	L	L	L	L	L	L	This policy guides development to areas of lower risk, ensures developments take into account all sources of flooding and outlines which land uses and developments are acceptable or unacceptable in which flood risk areas. This policy is not relevant for any of the equalities groups.
Sustainable Drainage	L	L	L	L	L	L	This policy sets out that surface water must be disposed off in a sustainable way and has no impact on any of the equalities groups.
Protection of flood defences	L	L	L	L	L	L	This policy for protecting flood defences has no impact on any of the equalities groups.
OPEN LAND, BIODIVERSITY, SPORT AND RECREATION, RIVER THAMES POLICIES							
Major developed site in the Green Belt	L	L	L	L	L	L	This policy recognises Hampton Water Treatment Works as Major developed site in the Green Belt and has no impacts on any of the equalities groups.
Metropolitan Open Land	L	L	L	L	L	L	Policy for protecting Metropolitan Open Land and detailing what development may be allowed is not relevant for any of the groups.
Other Open Land of Townscape Importance	L	L	L	L	L	L	This policy for protecting Other Open Land of Townscape Importance and has no impact on any of the equalities groups.
Public Open	L	L	M	L	L	L	This policy protects and enhances existing public

POLICIES	Equalities categories						
Space							open space and encourages improvement to convenient access for all – this includes disabled access.
Historic Parks, Gardens and Landscapes	L	L	L	L	L	L	This policy protects Historic Parks, Gardens and Landscapes and has no impact on any of the equalities groups.
Biodiversity and new development	L	L	L	L	L	L	Policy to ensure that new developments protect and enhance existing habitats and biodiversity features. It requires new developments to incorporate new features, which should make a positive contribution to the green infrastructure network. It has no impacts on any of the equalities groups.
Children’s and young people’s play facilities	L	L	M	M	L	L	This policy protects and enhances existing children’s and young people’s play facilities including access for all – this includes disabled access.
Sport and recreation facilities	L	L	M	L	L	L	This policy protects and enhances sports grounds including playing fields and private open space in recreational use. It encourages making private facilities available for public access – this includes disabled access.
Floodlighting	L	L	L	L	L	L	This policy sets criteria for the use of floodlights and has no impact on any of the equalities groups.
Allotments	L	L	L	L	L	L	Policy for protecting existing allotments and supporting the provision of new allotments. It has no impact on any of the equalities groups.
Thames Policy Area	L	L	M	L	L	L	Policy protecting the special character of the river Thames and it sets out criteria for enhancement. It encourages public access alongside and to the river – this includes disabled access.
Riverside Uses	L	L	L	L	L	L	This policy protects existing riverside uses, in

POLICIES	Equalities categories						
							particular river-related industry. It has no impact on any of the equalities groups.
Moorings and floating structures	L	L	L	L	L	L	This policy restricts moorings and other floating structures. It has no impact on any of the equalities groups.
TOWN CENTRE POLICIES							
Policy TC 1 – Larger Town Centres	L	M	H	H	L	L	A policy that seeks to maintain and enhance centres and thus provides local services for the most part within easy walking distance of residents' homes is likely to have significant positive effects. It helps to reduce travel, has a social benefit in providing top-up shopping facilities that are close to where residents live and therefore assists those (35% of people) who do not have access to a car for shopping, which may include older people, disabled people and the less well-off.
Policy TC 2 – Local and Neighbourhood Centres and Areas of Mixed Use	L	M	H	H	L	L	As above.
Policy TC 3 – Retail Frontages	L	L	L	L	L	L	Preferred approach would be neutral in terms of equalities considerations.
Policy TC 4 - The Evening Economy	L	L	L	L	L	L	Preferred approach would be neutral in terms of equalities considerations.
Policy TC 5 – Local Shops and Public Houses	L	M	H	H	L	L	A policy that seeks to maintain local services – in the form of shops and public houses within walking distance of residents' homes is likely to have significant positive effects. It helps to reduce travel, has a social benefit in providing top-up shopping facilities that are close to where residents live and therefore assists those (35% of people) who do not

POLICIES	Equalities categories						
							have access to a car for shopping, which may include older people, disabled people and the less well-off. Public houses provide an important community role, but often have large premises and grounds that makes them attractive for conversion to other uses. A policy that presumes against the loss of these facilities will act to preserve these traditional centres of the community.
HERITAGE POLICIES							
Conservation Areas – protection and enhancement	L	L	L	L	L	L	This policy protects and enhances the Boroughs conservation areas
Preservation of Listed Buildings and Scheduled Ancient Monuments	L	L	M	L	L	L	Could be a conflict between protecting the listed building and adding alterations to improve disabled access, however policy takes account of this in the following clause “taking a practical approach towards the alteration of Listed Buildings to comply with the Disability Discrimination Act 2005 and subsequent amendments, provided that the building’s special interest is not harmed, using English Heritage advice as a basis”
Buildings of Townscape Merit	L	L	M	L	L	L	Could be a conflict between protecting the Building of Townscape Merit and adding alterations to improve disabled access, however policy takes account of this in the following clause” taking a practical approach towards the alteration of Buildings of Townscape Merit to comply with the Disability Discrimination Act 2005 and subsequent amendments, provided that the building’s special interest is not harmed, using English Heritage advice as a basis”
Archaeology	L	L	L	L	L	L	This policy protects the Boroughs archaeology
World Heritage							This policy protects and enhances the Boroughs

POLICIES	Equalities categories						
Site							World Heritage site and buffer zone
War Memorials	L	L	L	L	L	L	This policy protects and enhances the Boroughs war memorials
Views and Vistas	L	L	L	L	L	L	This policy protects and enhances identified views within the Borough
HOUSING POLICIES							
<i>For each proposed housing development management policy</i>							
Existing Housing (including conversions, reversions and non self-contained accommodation)	H	L	L	H	L	L	Seeks to protect existing housing and supply of small units, ensuring conversions and reversions contribute to overall dwelling stock. Choice of housing stock could benefit different types of households e.g. older people, overcrowding in BME groups.
Backland And Infill Development	M	M	M	M	M	M	Criteria based policy to assess the limited opportunities where backland and infill development may be considered acceptable. Could benefit existing communities, could equally restrict opportunities for new housing, but cannot identify specific impacts on equalities groups.
Housing Standards	H	H	H	H	H	H	Policy to ensure high standards of internal and external spaces to cater for current and future resident needs. Includes reference to accessible design. Highly relevant to all equalities groups.
Housing To Meet Specific Community Needs	H	H	H	H	H	H	Policy to protect existing and ensure delivery of new housing to meet local community needs. Could include for example extra-care housing, hostels, and benefit all equalities groups.
Affordable Housing – Off-Site Contributions From Small Sites	H	H	H	H	M	M	Policy to capture contributions towards affordable housing from small sites. Will lead to delivery of more affordable housing, therefore of high relevance to the poorest communities, women, ethnic minorities and disabled people.

POLICIES	Equalities categories						
Affordable Housing – Linked Sites	H	H	H	H	M	M	Policy to clarify exceptional circumstances when linked sites may be considered. Should maximise delivery of on-site or greater affordable housing provision, therefore of high relevance to the poorest communities, women, ethnic minorities and disabled people.
<i>For housing topics where a draft policy is not proposed</i>							
Housing Density and Mix	M	M	M	M	M	M	Policy would balance efficient use of land and consideration of character and amenity of the local area in allowing new development, but covered by other guidance. If a policy were included, unlikely to significantly alter provision of new housing and cannot identify specific impacts on equalities groups.
Gypsies and Travellers	H	L	L	L	L	L	Potentially high impact on race, but guidance is covered elsewhere and inclusion of a policy unlikely to assist with meeting needs and delivery of new sites.
Inclusive Environment	L	L	H	H	L	L	Potentially high impact for disability and age considerations, but guidance is covered elsewhere and inclusion of a policy unlikely to improve delivery of suitable housing.
SOCIAL INFRASTRUCTURE POLICIES							
New Social Infrastructure	H	H	H	H	H	H	Encouraging provision of new social infrastructure, including flexibility for dual use, could benefit all groups that may be able to use the services/facilities.
Loss of Social Infrastructure	H	H	H	H	H	H	Restricting the loss of existing social infrastructure and encouraging alternative social alternative uses could benefit all groups that may be users of the services/facilities.
EMPLOYMENT POLICIES							

POLICIES	Equalities categories						
Development of Offices, Industrial, Storage and Distribution uses	M	H	H	H	M	M	A mixed and vibrant economy offering a range of local job opportunities can promote and sustain economic and social well being . Diverse employment opportunities with full and part-time jobs available in the local area should have positive outcomes in terms of equalities considerations.
Retention of employment	M	H	H	H	M	M	Retaining a mixed economy offering a range of local job and business opportunities and services can promote and sustain economic and social well being particularly for those less able to travel far.
TRANSPORT AND PARKING POLICIES							
Matching Development to Transport Capacity	L	L	M	M	L	L	Need to ensure that when public transport accessibility is assessed, account is taken of those with lower personal mobility and low car ownership, which could include elderly people.
Transport and New Development	L	L	M	M	L	L	Need to ensure that when the impact of new development on the transport network is assessed, account is taken of those with lower personal mobility and low car ownership, which could include elderly people.
Enhancing Transport Links	L	L	M	L	L	L	Need to ensure that any new links are fully accessible
Integration of different types of Transport and Interchange Facilities	L	L	M	M	L	L	Need to ensure that integrated transport facilities take full account of needs of disabled and elderly people and women (with children or taking account of personal security issues)
Taxis and Private Hire Vehicles	L	M	M	M	L	L	Need to ensure that provision of taxi and private hire vehicle facilities take full account of needs of disabled and elderly people and women (taking

POLICIES	Equalities categories						
Walking and Pedestrian Environment	L	M	M	M	L	L	account of personal security issues) Need to ensure that walking and the pedestrian environment account is taken of needs of disabled and elderly people and parents with buggies and/or small children
Cycling	L	L	M	M	L	L	Cycling provision should take account of needs of disabled and elderly people. Facilities such as shared cycle/pedestrian routes must take account of the needs of disabled and elderly people and parents with buggies and/or small children
Parking	L	L	M	M	L	L	Need to ensure that parking standards take full account of needs of disabled and elderly people
Forecourt Parking	L	L	M	L	L	L	Disabled people may have a need for forecourt parking which might over-ride this policy, in this case an exception might be made.
DESIGN AND DEVELOPMENT CONTROL POLICIES							
Design Quality	L	L	M	L	L	L	The design of a development must take account of disabled access, however add <u>“including by disabled people.”</u> under the section on Layout and Access to emphasise this point.
Layout and Design of Mixed Use Schemes	L	L	M	L	L	L	Shared facilities might have a disproportionate impact on disabled people, add within justification <u>“Account should be taken of potential disabled occupiers or visitors “</u> , in addition the SPD will include reference to disabled access.
Trees and Landscape	L	L	L	L	L	L	Low impact
Neighbourliness, Sunlighting and Daylighting	L	L	L	L	L	L	Low impact

POLICIES	Equalities categories						
Balconies and upper floor terraces	L	L	L	L	L	L	Low impact
Shop Fronts and Shop Signs	L	L	M	L	L	L	It is important to ensure accessibility for disabled people with the design of new or replacement shop fronts. This is taken into account in the following clause in the policy “New shop fronts must be designed to allow equal access for all users”
Advertisements and Hoardings	L	L	M	L	L	L	<p>The design and positioning of adverts can cause obstructions to disabled people, particularly those in wheel chairs or with visual impairments. Add further clause (shown underlined) to policy “The Council will exercise strict control over the design and siting of advertisement hoardings and other advertisements to ensure that the character of individual buildings and streets is not demonstrably harmed, having regard to the interests of amenity and public safety, <u>including for disabled people</u>, and highway safety.</p> <p>Powers will be used to remove any advertisement or hoarding erected without permission and where appropriate and practical to challenge existing hoardings and advertisements that cause substantial injury to visual amenity and public safety, <u>including for disabled people</u>.</p> <p>(also add this to the justification)</p>
Planning Application Checklist	L	L	L	L	L	L	Low impact