



London Borough of Richmond upon Thames

Local Plan

Publication Local Plan

Equalities Impact Assessment

December 2016

Equalities Impact Assessment of the LBRuT Publication Local Plan

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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) Publication version of the Local Plan ('the Plan').
- 1.2 The purpose of the EqIA is to consider the likely impact of the Plan on the target groups, and where required, taking action to improve or mitigate potential impacts of the policies.

2 The Local Plan

- 2.1 Following an informal scoping consultation throughout January 2016, a statutory public consultation on the pre-publication version of the Local Plan took place between 8 July and 19 August 2016. 101 responses were received and these were taken into account in the development of the publication version of the Plan. The publication version of the Plan is now subject to 6 weeks consultation from 5 January until 15 February 2017.
- 2.2 The updated Plan is a review and consolidation of all existing policies in the Core Strategy and Development Management Plan to bring the policies in line with national and regional policy and reflect the most up to date evidence. The Plan takes forward 45 borough-wide development policies. In addition, the Plan takes forward the specific allocations for 28 sites, which are considered to assist with the delivery of the Spatial Strategy and to ensure sufficient land is allocated to help meeting present and future needs for housing, employment, retail, social infrastructure and leisure facilities.
- 2.3 The Plan will provide the strategic planning framework for the borough, guiding development over the next 15 years. It covers the whole borough although the site-specific proposals for Twickenham town centre are set out in the Twickenham Area Action Plan (adopted in July 2013).
- 2.4 Once the consultation on the Plan closes, the EqIA, including all consultation responses, will be submitted alongside the Plan as a supporting document. Adoption of the Plan is anticipated to be in early 2018.

3 Borough profile, characteristics and key issues

- 3.1 The borough covers an area of 5,095 hectares (14,591 acres) in southwest London and is the only London borough spanning both sides of the Thames. Detailed information on borough characteristics can be found in the Authority's Monitoring Report¹.

¹ www.richmond.gov.uk/authority_monitoring_report

- 3.2 The main centre of the borough is Richmond; there are four district centres at Twickenham, Teddington, East Sheen and Whitton and many smaller centres. Although the borough is characterised by expensive private housing, there are significant numbers of people who are less well-off and some areas which are relatively deprived. According to the English Indices of Multiple Deprivation 2015, there are pockets of relative deprivation in the wards of Hampton North, Heathfield and Barnes. One small area, in the ward of Hampton North in the far south west of the borough, falls into the second 20% most deprived small areas in England.
- 3.3 The 2011 Census indicated that there were 187,000 people living in the Borough; the GLA 2014 Round (SHLAA Long Term) based projections for year 2015 is 196,200. The number of older residents is increasing and the community is becoming more diverse, with wider differences in household wealth, more disabled people and more ethnic diversity (although there is a lower than London average percentage of residents from ethnic minority groups).
- 3.4 Borough residents have amongst the highest life expectancy at birth in the UK. Health indicators show that borough residents generally take care of themselves with higher levels of healthy eating and exercise and lower levels of smoking than the national average. Deaths from smoking, heart disease and cancers are lower than the national average. The picture is more mixed in relation to numbers registered with severe mental health problems and the rate of road injuries and deaths, which are above the national average (but the latter is low for London). The five wards with relatively high levels of deprivation have the worst health problems.
- 3.5 There are 10 secondary schools, 44 primary schools and two special schools. The standards achieved by pupils in Richmond's primary and secondary schools and academies are above the national average.
- 3.6 The borough has many cultural facilities including the Richmond Theatre and the Orange Tree theatre. The Council has 14 Libraries. The main arts facilities are the Orleans Gallery and Stables Gallery in Twickenham and the Riverside Gallery in Richmond. The service is working to provide more local events through the use of existing community buildings.
- 3.7 Richmond and Twickenham are the largest centres in the borough, providing a range of shops, offices, educational, community, leisure and entertainment facilities. Public transport connections are good with both above ground and underground train services.
- 3.8 There have been improvements to all of the borough's centres to make them more accessible to disabled people, but there remains a need for further improvements both to the public realm and access to individual shops and services.
- 3.9 The key issues of relevance to EqIA that affect the borough were identified through the review of policies, plans and programmes and research into baseline characteristics. They are set out in Table 3.1.

Table 1: Key issues affecting people of the London Borough of Richmond upon Thames

Issue	Description
Varying levels of poverty & social exclusion	<ul style="list-style-type: none"> The borough is generally affluent and there are no areas in the borough ranked within the most deprived decile of local authorities in England according to the Index of Multiple Deprivation 2015, however there are pockets of local deprivation in the wards of Hampton North, Heathfield and Barnes.
Need to provide adequate housing supply	<ul style="list-style-type: none"> The provision of housing is one of the most important issues affecting the borough.
Affordable housing price/earnings affordability ratio	<ul style="list-style-type: none"> Average house prices in the area are much higher (£681,964 according to Land Registry, September 2016) than the National Average (£234,250). This makes it difficult for people to afford to buy homes. Private rents are also high and there is also a shortage of affordable (rented / part-owned) homes in the district. The Council's housing service indicates that provision of family accommodation for affordable rent is the main priority.
Access to essential facilities and services	<ul style="list-style-type: none"> Generally the health of the borough is good, with high life expectancy, however the population is aging and this will require additional services and facilities to support its well-being. Education: Results from the borough's schools are generally above the England average. Due to increasing demand (often from outside the borough) many schools are operating at capacity. The population of the borough is generally well educated, with a well-qualified workforce. There is known to be a lack of provision of childcare facilities/after school clubs. The pressure on nursery places is likely to be intensified by the Government's recent provision of 30 hours of free childcare for 3 and 4 year olds with working parents. Leisure: Access to a range of accessible and inclusive activities could enhance the quality of life of residents and visitors.
Access to local employment	<ul style="list-style-type: none"> Unemployment is relatively low in the borough but a large proportion of employment space has been lost in recent years due to permitted development rights and the resulting shortage of space may impact negatively on the opportunity for people to work locally and flexibly, including opportunities for part-time working which could impact disproportionately on women.
A safe place to live	<ul style="list-style-type: none"> Fear of crime and antisocial behaviour (which is disproportionate to actual level of crime) may lead to negative effects upon the mental health and wellbeing of residents, particularly more vulnerable groups. Disorder, especially related to crowds and weekend visitors to the borough's town centres, can sometimes be a concern.
Public transport accessibility	<ul style="list-style-type: none"> High levels of car ownership and dependency in the borough mean that those without a car may be disadvantaged.
High pollution levels and poor air quality	<ul style="list-style-type: none"> The main source of pollution is the large volume of road and air traffic. Those communities near busy roads are more at risk of negative effects.
Impacts of climate change	<ul style="list-style-type: none"> Carbon dioxide emissions from domestic properties and road traffic, leading to climate change, is considered to adversely affect all groups.

- 3.10 Further information, including on population and demography, economy and employment, health and social care, crime, transport and travel, housing, community wellbeing and environment, is available on the [DataRich website](http://www.richmond.gov.uk/datarich) (www.richmond.gov.uk/datarich), which is the one stop shop for statistics and analysis for the borough. It contains a vast range of 2011 Census data and also a [profile of key facts about the Borough](#).

4 Protected Characteristics

- 4.1 The duty to carry out an Equality Impact Assessment (EqIA) of new policy is set out in the Equality Act 2010. The Equality Act 2010 provides a cross-cutting legislative framework to protect the rights of individuals and advance equality of opportunity for all; and to deliver a simple, modern and accessible framework of discrimination law which protects individuals from unfair treatment and promotes a fair and more equal society. The Equalities Act 2010 simplifies previous legislation by combining the following:
1. the Equal Pay Act 1970
 2. the Sex Discrimination Act 1975
 3. the Race Relations Act 1976
 4. the Disability Discrimination Act 1995
 5. the Employment Equality (Religion or Belief) Regulations 2003
 6. the Employment Equality (Sexual Orientation) Regulations 2003
 7. the Employment Equality (Age) Regulations 2006
 8. the Equality Act 2006, Part 2
 9. the Equality Act (Sexual Orientation) Regulations 2007
- 4.2 The Public Sector Equality Duty 2011 was created under the Equality Act 2010. The Equality Duty replaces the three previous duties on race, disability and gender, bringing them together into a single duty, and extends it to cover age, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment. The aim of the Duty is for public bodies to consider the needs of all individuals including in developing policy and in delivering services.
- 4.3 There are nine protected characteristics, which are as follows:
1. Age
 2. Disability
 3. Gender reassignment
 4. Marriage and Civil Partnership
 5. Race
 6. Religion or belief
 7. Sex
 8. Sexual orientation
 9. Pregnancy and Maternity

4.4 Within this assessment these have been grouped as follows:

Black and Minority Ethnic people (BME); gender/maternity/marriage; disability; age; lesbians, gay men and transgender people (LGBT); and faith groups.

The Council's Equality and Diversity Policy

4.5 The Council's Equality and Diversity Policy and other related information 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 publishes a range of information to demonstrate how, as a Council, we have been implementing the Public Sector Equality Duty. Further information can be viewed at this link:

www.richmond.gov.uk/equality_and_diversity

- We positively welcome and aim to support the growing diversity of the community we serve and the people we employ. Our diversity is our strength and we are committed to providing services to our many different communities, by a workforce that reflects the diversity of society.
- We also acknowledge that we live in an unequal society in which many people face discrimination. We believe that equality of opportunity and freedom from discrimination are fundamental human rights. We actively oppose all forms of discrimination and are committed to the principle that no person shall face discrimination by being treated unfairly or being denied access to services or employment opportunities.
- We will not discriminate (indirectly, directly or by association) on the grounds of race, sex, gender reassignment, marital or partnership status, sexual orientation, age, religion or belief, HIV status, or disability (e.g. sensory and physical disabilities, learning disabilities and mental health status).
- Discrimination as outlined above and harassment is unacceptable and contrary to our explicit aim of providing quality services and recruiting and retaining diverse staff.
- Quality means equality in the services we plan and provide, and in the staff we employ to provide those services. We cannot achieve our aim of providing good quality well managed services unless we take into consideration the diverse needs of all sections of our diverse communities and aim to become an organisation with a well-developed workforce, which is able to respond to those diverse needs at all levels of the workforce. This is key to customer care and fairness for all.
- We will build on the strengths of diversity and communicate with staff and our local communities to achieve a shared understanding of the local and national contexts within which we all work or live. This is key

to all people who live, visit and work in the borough feeling ‘safe’ and being able to ‘take pride’ in a borough which values and respects its growing diversity and promotes good relations between all sections of its communities.

- We aim to be a borough which values the diversity of all its communities and enables all its residents to become full and active citizens, to feel safe, included, respected, valued and share a sense of belonging
- We intend to promote equality, value diversity and prevent discrimination through our roles as
 - Provider and commissioner of services
 - Employer
 - Community leader
- We intend to progressively achieve this through a programme of audit, review, impact/needs assessment and analysis, development of equality objectives and outcomes, monitoring, consultation, scrutiny and changes to how we work. This will be undertaken as part of a programme of continuous development and mainstreaming of equality/diversity considerations throughout the whole business of the Council.

5 Findings of the Equalities Impact Assessment

- 5.1 Comment on anticipated impacts of the Local Plan is broken down below by equalities group. Within each section, discussion is broadly divided up by policy area, based on the table in Appendix 1.

Black and Minority Ethnic Groups (BME)

- 5.2 The following table shows the current ethnic group mix in the borough, compared to regional and national comparators:

	Richmond Borough		London	England & Wales
	Numbers	%	%	%
White: British	133,582	71.4	44.9	80.5
White: Irish	4,766	2.5	2.2	0.9
White: Other White	22,282	11.9	12.6	4.4
White: Gypsy or Irish Traveller	95	0.1	0.1	0.1
Mixed: White and Black Caribbean	1,250	0.7	1.5	0.8
Mixed: White and Black African	731	0.4	0.8	0.3
Mixed: White and Asian	2,857	1.5	1.2	0.6
Mixed: Other Mixed	1,942	1.0	1.5	0.5
Asian or Asian British: Indian	5,202	2.8	6.6	2.5
Asian or Asian British: Pakistani	1,163	0.6	2.7	2.0
Asian or Asian British:	867	0.5	2.7	0.8

	Richmond Borough		London	England & Wales
	Numbers	%	%	%
Bangladeshi				
Asian /Asian British: Chinese	1,753	0.9	1.5	0.7
Asian or Asian British: Other Asian	4,622	2.5	4.9	1.5
Black or Black British: Caribbean	840	0.4	4.2	1.1
Black or Black British: African	1,643	0.9	7.0	1.8
Black or Black British: Other Black	333	0.2	2.1	0.5
Other ethnic group: Arab	1,172	0.6	1.3	0.4
Other ethnic group: Any other ethnic group	1,890	1.0	2.1	0.6

Ethnic groups; Source: Census of Population 2011, Key Statistics Table KS201EW
Ethnic group, local authorities in England and Wales © Crown copyright

- 5.3 Richmond borough is less ethnically diverse than the London average, according to the 2011 census. 14% of Richmond residents are classified as BME groups, in comparison 40.2% across London as a whole. The proportion of Richmond's resident population from BME groups has increased from 9% to 14% since the 2001 Census, and growth is expected to continue.
- 5.4 There are variations in ethnic diversity between Richmond's wards. In particular, Heathfield and Whitton wards have higher proportions of BME populations, mainly from Asian groups. It is recognised that different ethnic groups have different needs in terms of health and social care services and other types of community infrastructure. Therefore, the community facilities policies, particularly LP28, are considered to impact positively on the BME groups as they will encourage adequate provision of services, facilities and infrastructure appropriate to meet the needs of this community. It is important that they are provided in the correct locations.
- 5.5 People from BME backgrounds are more likely to have difficulty accessing suitable housing, or to be living in dwellings unsuitable for their needs. Housing policies (LP35-LP38) seek to ensure a suitable mix of housing and tenure that reflects local need, including the provision of additional family sized dwellings across all tenures. This is considered to provide potential benefits to BME communities, some of which tend to have larger family sizes and may be housed in unsuitably sized accommodation.
- 5.6 Richmond has one authorised travellers' site in Hampton North, managed by Richmond Housing Partnership (RHP), which provides 12 pitches for gypsy and traveller families. Housing policy LP37 seeks to protect this site and ensure provision is made for travellers and will therefore have a positive impact on this group.

- 5.7 BME groups often choose to start up their own small businesses as a traditional way out of unemployment. Therefore, the employment policies (LP40-LP42), which encourage the provision of small employment units (both commercial and industrial) for local businesses, are considered to be beneficial for this group.
- 5.8 Other policies of the Local Plan including the local character and design policies, the green infrastructure policies, climate change and sustainable design policies, town centres policies and transport policies are all expected to have a limited impact on BME groups.
- 5.9 In terms of site allocations, all proposal sites are considered to have positive impacts on the BME group in terms of equal opportunities, identified either as high, medium or low, consistent with the other equalities groups for each proposal. It is noted that particularly those proposals that seek to protect social infrastructure and community uses have positive impacts on the BME group.

Gender/maternity/marriage

- 5.10 In Richmond, the numbers and proportions of men (49%) and women (51%) are roughly equal overall, and across life-course age-bands until later life. As women experience longer life expectancy than men, by the time people are aged 85 years and over there are more than twice as many women as men. This pattern has a number of implications for the needs of women. For instance, the older age profile of women means that they suffer higher rates of chronic disease and require access to appropriate elderly care services, and it needs to be recognized that they are more likely to be living alone without a partner / carer. Therefore women may have a greater need for special needs housing and other support to allow independent living for as long as possible. Housing policies and the community facilities policies, particularly LP37, LP28 and LP30, in relation to provision of supported housing and health infrastructure, are considered to be particularly positive in this regard.
- 5.11 Employment is lower for men than women in the borough. 82.1% of men are in employment and 77.2% of women are in employment (2015), and women are more likely to be employed part time due to caring responsibilities such as childcare. Therefore, employment policies (LP40-LP42) which seek to ensure local and flexible employment options are considered to have a positive impact on employment for women.
- 5.12 Women generally have lower levels of access to private cars than men and are more likely to travel by public transport, particularly buses, to access local services. Women may also be pregnant and/or accompanied by children, perhaps in buggies. Therefore, the transport policy LP44 which seeks, amongst other things, improvements to public transport accessibility and interchanges are likely to benefit women and other groups who do not have access to a car. The Plan's spatial strategy and town centre policies (LP25-LP27) seek to maintain and

reinforce the traditional village based structure and centres within this borough, ensuring a range of housing, local shops and services as well as employment are available at the most local level possible. This will not only benefit women and other protected groups by facilitating continued access to a wide range of shops in close proximity to their homes, but it will also reinforce community life and social cohesion.

- 5.13 Pregnant women and sole parents (who most often are women) may have specific housing needs due to reduced mobility and the need for additional space requirements associated with the care of young children. Housing policies (LP35-LP38) seek to ensure an appropriate mix of housing which could be beneficial to women by offering housing choices.
- 5.14 Elements of the local character and design policies such as LP1 which might improve design of public space and encourage feelings of safety and personal security are considered to benefit women as well as other vulnerable groups.
- 5.15 Other policies of the Local Plan including the green infrastructure policies, climate change and sustainable design policies are expected to have a neutral impact on gender.
- 5.16 In terms of the proposed site allocations, Cassel Hospital and Richmond Station have both been identified as having in particular the potential for high positive impacts on the gender group in terms of equal opportunities because of the potential on each site to provide a range of different services in close proximity which provides easy access for women who may be travelling with small children or buggies.

Disabled people

- 5.17 The 2011 Census data show that 11.5% of the borough's population felt that their day to day activities were limited either a lot or a little by their health, which compares to 14.1% in Greater London and 16% in England. Some 57.3% of borough residents considered their health to be "very good" (50.5% in London, 47.2% in England) and only 0.8% as "very bad" (1.2% for both London and England). The borough compares well using these two indicators.
- 5.18 In terms of physical or sensory disability, the design of the built environment is important for helping people to move around easily. Policies within the local character and design section, particularly LP1, consider the needs of the disabled population and specifically state that the design of the built environment should be inclusive and incorporate improved accessibility for the disabled. The potential for conflict between making accessibility improvements and preserving historic features on listed buildings has been noted in the table in Appendix 1 under the designated heritage assets policy (LP3).

- 5.19 Housing policy LP35 sets out requirements for the percentage of new housing that should be 'accessible and adaptable' and 'wheelchair user dwellings' in line with national standards; this is considered to impact positively on disabled people to ensure an adequate choice of appropriately accessible housing options are available.
- 5.20 The Labour Force Survey (published on a quarterly basis) consistently shows that disabled people experience relatively low rates of employment across London and the UK. The employment rate for disabled Londoners is 49%, significantly lower than the rate for non-disabled people of 76%. Disabled workers are also more likely to work part-time than non-disabled workers. Therefore, employment and local economy policies (LP40-LP42) which seek to protect local employment may be positive for disabled people, providing potential opportunities for work.
- 5.21 Transport policy LP44 seeks to guide development to areas accessible by public transport which could benefit people with physical disabilities, making it easier for them to access facilities within their local area. This policy also emphasises improvements to accessibility of transport facilities and interchange arrangements which is also considered to benefit disabled people. The parking standards policy LP45 sets out requirements for provision of adequate disabled parking.
- 5.22 Policies within the community facilities section, particularly LP28 and LP30, emphasise the importance of access for all, including the disabled, and also encourage co-location of facilities. Town centres policies, particularly LP27, which seek to maintain local shops and services within walking distance of where people live reduces the need to travel, therefore assisting those with mobility difficulties.
- 5.23 In terms of learning disability, mental health or special educational needs, a number of policies are considered to have positive impacts, particularly within the community facilities section. For example the education and training policy LP29 supports the development of Special Educational Needs (SEN) units within schools where they are required. The health and wellbeing policy LP30 emphasises the importance of 'place' in mental wellbeing, for example it is known that access to the natural environment has positive effects on mental wellbeing, which also indicates that green infrastructure policies may have positive impacts on this group.
- 5.24 The climate change policies are considered to have little specific impact on this group.
- 5.25 In terms of site allocations, Richmond College in particular has been identified as having high positive impacts on disabled people in terms of equal opportunities because of the provision of a SEN school on the site. Richmond Station has been identified as having high positive impacts because of accessibility improvements at this major transport interchange. The provision of a new village community on the Stag

Brewery site is also considered to have high positive impacts because of the mix of facilities that will be provided in close proximity and the associated ease of access for disabled members of the community.

Age

- 5.26 The 2011 Census data suggest that the borough has a relatively high proportion of older persons. ONS projections show a significant increase in the age 85+ population over the next 12 years. In addition, Richmond has the highest proportion of people aged over 75 and living alone in London (51% v 35% London-wide) and there are increasing numbers of older people living at home with multiple long term conditions (physical and mental) such as dementia. It is known that many of London's older people experience high levels of isolation.
- 5.27 The Local Plan policies consider the needs of older people, particularly the policies within the community facilities section. For example the health and wellbeing policy LP30 states that development and the public realm should be designed in such a way that is inclusive and considers the needs of all including the older population which will enable older people to remain independent and active for longer, thereby reducing the need for extensive adaptations to buildings. Measures such as more seating opportunities and benches are encouraged. It also encourages major developments to ensure public toilets are available to the community, which will benefit everyone, including the older population. Given the increasing prevalence of dementia, the policy also encourages consideration to be given to 'dementia-friendly' environments. Other policies within this section are considered to have beneficial impacts on the older population, for example the social and community infrastructure policy LP28 emphasises the importance of community infrastructure and states that it should be inclusive and accessible to all and co-location is encouraged. Another example is the allotments policy LP32 which, noting that allotments are often used by retired or older members of the community, encourages retention of allotments not only for the benefits of growing fresh food but also for opportunities for social interaction.
- 5.28 Housing policies (LP34-LP39) which seek to ensure housing is accessible and ensure that a range of different sizes and types is provided is considered to be beneficial for older people. Policy LP37 specifically considers the boroughs needs for extra care housing for older people who require ongoing care and support, noting there may be some remodelling of existing sheltered accommodation. These policies are therefore considered to have positive impacts.
- 5.29 The climate change and sustainable design policies such as LP20 and LP22 will benefit older people by ensuring that new development is adaptable and resilient to climatic changes which will be beneficial in terms of regulating temperatures within the home and as it is known that older people are at greater risk from overheating and being negatively affected by the cold. The flood risk policy LP21 emphasises the

importance of safe access and egress away from developments in flood risk areas being accessible for all, which includes the elderly and young children who are at risk of suffering disproportionate harm from flood events and accordingly will benefit significantly from the implementation of this policy.

- 5.30 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. Therefore transport policy LP44 which seeks to ensure improvements to public transport and interchange facilities will benefit this group, and the town centres policies, particularly LP27, which protect shops and services close to homes will be beneficial in terms of ensuring easy access for the elderly to shopping and other facilities, particularly to meet their day to day needs, as well as cultural and entertainment facilities locally.
- 5.31 Similarly to the disability category, older people may experience mobility difficulties and therefore policies which seek to protect local character such as policy LP3 on 'designated heritage assets' has the potential to conflict with the needs of older people in relation to the need to preserve listed and other protected buildings building and subsequent difficulty in adaptation to improve accessibility for all.
- 5.32 Green infrastructure policies (LP12-LP19) are generally considered to have relatively low impact on the elderly population, although it is noted that access to green infrastructure, open space and nature can improve feelings of wellbeing for all members of the community, including the elderly. Policies on employment and the local economy are considered to have little impact on the elderly.
- 5.33 With reference to younger people, the community facilities policies are considered to be beneficial for this group, particularly the education and training policy LP29 which will ensure education requirements for young people are met. The social and community infrastructure policy LP28 promotes community facilities such as youth centres and recreation facilities. Related to this, policies which encourage sport and physical activity including the public open space, play space, sport and recreation policy (LP31) and the health and wellbeing policy (LP30) are considered to be beneficial to this group and young people are particularly encouraged to engage in physical activity in order to encourage healthier lifestyles, although it is noted that this will also be beneficial for all members of the community. LP31 also aims to improve the quality of, and access to existing open space and aims to ensure adequate provision of playspace areas which will benefit children, particularly those in new developments.
- 5.34 Younger people are more likely to walk, cycle or use buses than other groups, so transport policy LP44 which encourages these forms of sustainable transport are considered to particularly benefit this group.

- 5.35 Housing policy LP37 notes the potential need for student accommodation if this is evidenced by institutions in the borough. Students are generally more economically disadvantaged compared to the wider community so housing policies could have positive impacts on this group.
- 5.36 Employment policies are considered to be beneficial for younger people wishing to enter the workforce. Employment policies LP40-LP42 encourage modern methods of working such as co-working and flexible workspace which are likely to be more attractive to the younger generation.
- 5.37 Other policies in this plan including those on Local character and design, Green infrastructure, Climate change, Town centres, Housing and Employment are likely to have only minor impacts on young people.
- 5.38 In terms of site allocations, St Mary's University, Richmond College, Ryde House, Barnes Hospital and the Stag Brewery are considered to be particularly beneficial to the younger age group in terms of equal opportunities because of the improved or additional educational provision. For the older population, Richmond station has been identified as having high positive impacts because accessibility improvements at this major station interchange and provision of town centre uses in close proximity to the train station will potentially facilitate ease of access for older people, who may have limited mobility, to local facilities and services.

Lesbians, gay men, bisexuals and transgender people

- 5.39 The 2011 Census did not have a specific question regarding sexual orientation, but found that 665 people (0.35% of the Borough population) reported being in a same sex Civil Partnership. Estimates of the prevalence and incidence of transgender people are difficult to quantify due to the lack of robust national data.
- 5.40 For the LGBT group as a whole, some policies within the Local Plan are considered to have a positive impact, for example the local character and design quality policy LP1 as well as transport policy LP44 which both encourage natural surveillance and appropriate lighting levels, which could potentially help members of the LGBT group to feel safe. In addition, the community facilities policies, particularly LP28, encourage access for all and inclusivity within community facilities which is considered to be beneficial for the LGBT group.
- 5.41 Lesbian Gay and Bisexual members of the community are not considered to be affected differently by the remainder of the policies within the Local Plan, however the needs of transgender people may require further discussion. Whilst Richmond borough is generally safe and experiences low levels of crime, it is known that the Trans community experiences disproportionate levels of discrimination, harassment and abuse and therefore policies which encourage feelings

of safety and security, as mentioned above, will be beneficial. It is also known that finding and retaining work is difficult for the Trans community so employment policies may facilitate employment or provide opportunities for starting businesses. Housing is a concern as roughly 30% of Trans individuals report being expelled from their home as a result of their status (Richmond [JSNA](#)); and access to and participation in venue-based physical activity can be a concern because of gender-specific facilities. The latter two points will need to be considered by the providers rather than the Local Plan.

- 5.42 The policies within the Local Plan generally encourage equality and inclusivity and are not considered to have any negative impacts on the LGBT group. Similarly, the site allocations are all considered to have a low or medium positive impact on the LGBT group in terms of equal opportunities, consistent with the other equalities groups for each proposal.

Faith groups

- 5.43 The following table from the 2011 Census shows the expressed religious denomination of residents in the borough with regional and national comparators.

	Richmond upon Thames	Greater London	England
Christian	55.3	48.4	59.4
Buddhist	0.8	1	0.5
Hindu	1.6	5	1.5
Jewish	0.8	1.8	0.5
Muslim	3.3	12.4	5
Sikh	0.8	1.5	0.8
Other Religion	0.5	0.6	0.4
No Religion	28.4	20.7	24.7
Religion Not Stated	8.5	8.5	7.2

© Crown copyright, Source: ONS, Key Statistics, Table KS209

- 5.44 The community facilities policies, particularly LP28, seek to retain and ensure provision of facilities to meet people's needs and this includes faith facilities and religious meeting places, therefore the policy which seeks the enhancement and replacement of existing facilities where there is an identified need will benefit religious groups. The remainder of the policies of the local plan including Local character and design, Green infrastructure, Climate change and sustainable design, Town centres, Housing, Employment and local economy and Transport are considered to have a neutral impact on religious or faith groups.
- 5.45 The site allocations are all considered to have a low or medium positive impact on the faith groups in terms of equal opportunities, consistent with the other equalities groups for each proposal.
- 5.46 **Appendix 1 sets out in detail the Equalities Impact Assessment for the draft Local Plan.**

Appendix 1: Equalities Impact Assessment

Impact of draft Local Plan Policies on Equalities Categories

- (L) Low**
(M) Medium
(H) High
(+) Positive
(-) Negative
(N) Neutral

Policy	Equalities categories						Commentary
	Race	Gender	Disability	Age	LGBT	Religion	
LOCAL CHARACTER AND DESIGN							
LP1 Local Character and Design Quality	H+	H+	H+	H+	H+	H+	This policy seeks to ensure high quality design and improve the character of the area. It emphasises that good quality design should be inclusive, incorporate improved accessibility for the disabled and the elderly, and encourages natural surveillance to ensure safety and security for all. Therefore this policy is considered to have a high positive impact on all equalities groups.
LP2 Building Heights	N	N	N	N	N	N	This policy seeks to ensure appropriate building heights and will have a neutral impact on the equalities groups.
LP3 Designated Heritage Assets	N	N	L-	L-	N	N	This policy seeks to protect Listed Buildings and Conservation Areas and other designated heritage assets. There may be some conflict between protecting heritage assets and making alterations to improve disabled access, e.g. ramps / lifts may not be considered

Policy	Equalities categories						Commentary
	Race	Gender	Disability	Age	LGBT	Religion	
							appropriate in some listed buildings, so the policy is considered to have a low negative impact on disabled groups and the elderly and a neutral impact on other equalities groups.
LP4 Non-Designated Heritage Assets	N	N	L-	L-	N	N	This policy seeks to protect Buildings of Townscape Merit and other non-designated heritage assets. As above there may be some conflict between protecting heritage assets and making alterations to improve disabled access.
LP5 Views and Vistas	N	N	N	N	N	N	This policy seeks to protect the quality of the views, vistas, gaps and the skyline and will have a low impact on the equalities groups.
LP6 Kew World Heritage Site	N	N	N	N	N	N	This policy seeks to protect and enhance the Royal Botanic Gardens Kew and will have a neutral impact on the equalities groups.
LP7 Archaeology	N	N	N	N	N	N	This policy seeks to protect and enhance the borough's archaeological heritage and will have a neutral impact on the equalities groups.
LP8 Amenity and Living Conditions	M+	M+	M+	M+	M+	M+	This policy seeks to protect the amenity and living conditions for occupants of all buildings. It will have a beneficial impact on all residents, users and occupiers of buildings, including all equalities groups.
LP9 Floodlighting	M+	M+	M+	M+	M+	M+	This policy sets out criteria for the use of floodlights. Whilst this policy is mainly aimed for floodlighting of sports pitches, there could be instances where additional lighting may also provide security and safety for vulnerable

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							groups particularly women, the elderly, LGBT, ethnic minority groups and anybody else who may feel vulnerable.
LP10 Local Environmental Impacts, Pollution and Land Contamination	M+	M+	M+	M+	M+	M+	This policy seeks to ensure there are no detrimental impacts on the health, safety and the amenity of occupiers or the surrounding land. It will have a beneficial impact on all residents, including all equalities groups.
LP11 Subterranean Developments and Basements	N	N	N	N	N	N	This policy sets out criteria for basement development and will have a neutral impact on the equalities groups.
GREEN INFRASTRUCTURE							
LP12 Green Infrastructure	M+	M+	L+	M+	M+	M+	This policy seeks to protect and enhance green infrastructure in the borough and will have a beneficial impact on all residents in terms of physical and mental wellbeing, including all equalities groups. Potential access difficulties mean that impacts have been rated as low (positive) for disabled groups and medium (positive) for other equalities groups.
LP13 Green Belt, Metropolitan Open Land and Local Green Space	L+	L+	L+	L+	L+	L+	This policy seeks to protect the borough's Green Belt, MOL and Local Green Space, and will have a low impact on the equalities groups.
LP14 Other Open Land of Townscape Importance	L+	L+	L+	L+	L+	L+	This policy seeks to protect the borough's OOLTI and will have a low impact on the equalities groups.
LP15 Biodiversity	L+	L+	L+	L+	L+	L+	This policy seeks to protect and enhance the borough's biodiversity and will have a low impact on the equalities groups.
LP16 Trees, Woodlands and	L+	L+	L+	L+	L+	L+	This policy seeks to protect and

Policy	Equalities categories						Commentary
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Landscape							enhance the borough's trees and landscape and will have a low impact on the equalities groups.
LP17 Green Roofs and Walls	L+	L+	L+	L+	L+	L+	This policy encourages the use of green roofs and walls and will have a low impact on the equalities groups.
LP18 River Corridors	M+	M+	L+	L+	M+	M+	This policy aims to improve the river environment (of all the borough's rivers) and improve public access. Access to the river may be difficult for those with mobility difficulties such as the elderly or disabled so the policy is considered to have a low positive impact on those groups and a medium positive impact on other equalities groups.
LP19 Moorings and Floating Structures	N	N	N	N	N	N	This policy resists new houseboats unless certain criteria are met. It will have a neutral impact on the equalities groups.
CLIMATE CHANGE AND SUSTAINABLE DESIGN							
LP20 Climate Change Adaptation	M+	M+	M+	H+	M+	M+	This policy seeks to ensure development is resilient to the impacts of climate change and requires development to minimise the effects of overheating. Older people are considered to be more at risk from overheating and therefore this policy has a high positive impact on the age category and a medium positive impact on other equalities groups.
LP21 Flood Risk and Sustainable Drainage	M+	M+	H+	H+	M+	M+	This policy guides development to areas of lower flood risk, ensures developments take into account all sources of flooding and outlines the types of land uses that are acceptable

Policy	Equalities categories						Commentary
	Race	Gender	Disability	Age	LGBT	Religion	
							in each flood risk area. The policy ensures safe access / egress to and from developments in flood risk areas for all users, included the disabled / elderly and therefore has a medium / high positive impact on the equalities groups.
LP22 Sustainable Design and Construction	L+	L+	L+	L+	L+	L+	This policy ensures buildings are designed and constructed sustainably with minimum carbon dioxide emissions, the use of decentralised energy where feasible and efficient use of water resources. This will benefit all groups but with no specific impact on the equalities groups.
LP23 Water Resources and Infrastructure	N	N	N	N	N	N	This policy seeks to protect water quality and will have a neutral impact on the equalities groups.
LP24 Waste Management	L+	L+	L+	L+	L+	L+	This policy is about management of waste and ensures that adequate refuse and recycling storage space and facilities, which allows for ease of collection and which residents and occupiers can easily access, is provided in all developments. It is therefore considered to have a low positive impact on all equalities groups.
TOWN CENTRES							
LP25 Development in Centres	M+	H+	M+	H+	M+	M+	This policy seeks to ensure appropriate retail, services and other uses in each centres within the hierarchy. District centres particularly Teddington, East Sheen and Whitton, focus on providing shops, services and employment to meet local needs which is beneficial in

Policy	Equalities categories						Commentary
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							terms of ease of access for those with mobility difficulties such as the disabled, elderly or those without a car, and for those who work part-time or have childcare commitments, often women. It is therefore considered to have high positive impacts on those groups and moderate positive impacts on other equalities groups.
LP26 Retail Frontages	M+	M+	M+	M+	M+	M+	This policy protects retail in key frontages, allows for controlled diversification away from A1 uses in secondary shopping frontages and controls over-concentration of certain uses in frontages. It will help to ensure a good mix and variety of uses and is therefore considered to have a medium positive impact on the equalities groups.
LP27 Local Shops, Services and Public Houses	M+	M+	H+	H+	M+	M+	This policy protects shops, services and pubs within walking distance of residents' homes. This has a social benefit in providing top-up shopping facilities close to where residents live and helps to reduce travel, therefore assisting those who do not have access to a car for shopping, which may include older / younger people, disabled people and the less well-off so the policy is considered to have a high positive impact on those groups. In addition, pubs play an important role in community cohesion and this policy seeks to protect against their loss. This element of this policy is considered to

Policy	Equalities categories						Commentary
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							have medium positive impact on the equalities groups.
COMMUNITY FACILITIES							
LP28 Social and Community Infrastructure	H+	H+	H+	H+	H+	H+	This policy seeks to protect community facilities including faith facilities and voluntary services, promotes multi-use and specifically emphasises the importance of providing access for all. This will have high positive impacts on all equalities groups.
LP29 Education	H+	H+	H+	H+	H+	H+	This policy seeks to ensure that the education requirements for children and young people are met and that local employment and training opportunities are generated by development in the borough. The policy specifically seeks to reduce inequalities and encourages multi-use, flexible and adaptable buildings, all of which will have high positive impacts on all equalities groups.
LP30 Health and Wellbeing	H+	H+	H+	H+	H+	H+	This policy promotes healthy lifestyles and the reduction of health inequalities and ensures adequate provision of health infrastructure. It specifically considers the health of the young population by restricting fast food takeaways in close proximity to schools and the older population by encouraging dementia-friendly environments. The policy is considered to have high positive impacts on all equalities groups
LP31 Public Open Space, Play Space, Sport and Recreation	H+	H+	H+	H+	H+	H+	This policy seeks to ensure adequate provision of public open space, play

Policy	Equalities categories						Commentary
	Race	Gender	Disability	Age	LGBT	Religion	
							space, sport and recreation facilities, all of which are considered to promote social cohesion and healthy lifestyles. The policy specifically seeks easy access to these spaces for all residents, therefore the policy is considered to have high positive impacts on all equalities groups.
LP32 Allotments and Food Growing Spaces	M+	M+	M+	H+	M+	M+	This policy seeks to protect allotments as they are considered to contribute towards a healthy lifestyle that is active, sustainable and socially inclusive. They may also provide an opportunity for less wealthy or younger residents who do not have private gardens to have access to outside space and grow their own produce. Therefore this policy is considered to have positive impacts on all equalities groups.
LP33 Telecommunications	H+	H+	H+	H+	H+	H+	This policy supports infrastructure for high speed broadband and telecommunications in order to improve connectivity across the borough. This will have a high positive impact on all equalities groups.
HOUSING							
LP34 New Housing	M+	M+	M+	M+	M+	M+	This policy seeks provision of new housing which is beneficial to all sections of the community, although this is not specific to the equalities groups. The policy is considered to have a medium positive impact.
LP35 Housing Mix and Standards	M+	H+	H+	H+	M+	M+	This policy requires an appropriate mix of housing types, sizes to be in line with the nationally described space

Policy	Equalities categories						Commentary
	Race	Gender	Disability	Age	LGBT	Religion	
							standards, appropriate external space and amenity space. 90% of all new build housing should be 'accessible and adaptable dwellings' and 10% of all new build housing is required should be 'wheelchair user dwellings' in line with Building Regulations Part M4. This is considered to have a high positive impact on the disabled, the elderly, families and other age groups seeking appropriately sized new homes in the borough, and a moderate positive impact on other equalities groups.
LP36 Affordable Housing	H+	H+	H+	H+	M+	M+	This policy seeks to maximise affordable housing delivery and secure contributions towards affordable housing on all housing sites. Affordable homes are considered to provide high positive benefits to all, particularly those on lower incomes which may include the younger and older population, women, ethnic minorities and disabled people. Starter Homes provide homes to first time buyers under the age of 40 at 80% of market value; whilst this has the potential to be beneficial for the younger age groups, in reality this is unlikely to be affordable for most in the borough so this initiative is not considered to be beneficial to the equalities groups.
LP37 Housing Needs of Different Groups	H+	M+	H+	H+	M+	M+	This policy seeks to provide adequate supported housing such as extra care accommodation to meet local needs,

Policy	Equalities categories						Commentary
	Race	Gender	Disability	Age	LGBT	Religion	
							and addresses sites for gypsies and travellers. This policy is considered to have high positive impacts on 'race', 'disability' and 'age' categories and moderate positive impacts on other equalities groups.
LP38 Loss of Housing	L+	L+	L+	L+	L+	L+	This policy seeks to retain existing housing to ensure provision and how to assess reversions/conversions and redevelopment. There are no specific impacts on the equalities groups so it is considered to have a low positive impact on all categories.
LP39 Infill, Backland and Backgarden Development	N	N	N	N	N	N	This policy sets out criteria for infill and backland development and resists the loss of backgarden land. It will have a neutral impact on the equalities groups.
EMPLOYMENT AND LOCAL ECONOMY							
LP40 Employment and Local Economy	H+	H+	M+	M+	L+	L+	This policy supports a strong local economy. A mixed and vibrant economy offering a range of local job opportunities sustains the economic and social wellbeing of the community. Provided that diverse full and part-time employment opportunities are available, this policy should be positive in terms of equalities considerations, for example working closer to home may be beneficial for those with childcare commitments or part-time workers - often women. The provision of small business units is particularly important for BME communities, for whom small businesses are a traditional way out of unemployment. Therefore this policy is

Policy	Equalities categories						Commentary
	Race	Gender	Disability	Age	LGBT	Religion	
							considered to have a high positive impact on the race and gender categories and a medium / low positive impact on other equalities groups.
LP41 Offices	H+	H+	M+	H+	M+	M+	This policy seeks to retain offices in the borough. There is a particularly need for provision of space for small and medium sized businesses and low-cost office space, which as noted above, are important for BME communities, and will also benefit low-income groups. The policy also supports modern office space such as 'co-working' which is likely to appeal to younger generations and those looking to start new businesses or work more flexibly, therefore this policy is considered to have high positive impacts on race, gender and age categories and medium positive impacts on other groups.
LP42 Industrial Land and Business Parks	M+	L+	M+	H+	M+	M+	This policy seeks to retain industrial space in the borough and supports local service trades as well as provision of new industrial space. These spaces may be attractive to 'creative' or 'tech' businesses who are likely to be of the younger generation. Therefore this policy is considered to have high positive impacts on the age category and medium positive benefits on other equalities categories.
LP43 Visitor Economy	M+	M+	M+	M+	M+	L+	Tourism can provide valuable benefits for local communities through the provision of jobs and facilities. Supporting the tourism sector has a

Policy	Equalities categories						Commentary
	Race	Gender	Disability	Age	LGBT	Religion	
							positive impact on the economy and helps to drive environmental improvements and regeneration. It has a social benefit in providing job opportunities which are close to where residents live and diverse employment opportunities serving as a possible stepping stone for people with little work experience or low skills
TRANSPORT							
LP44 Facilitating Sustainable Travel Choices	M+	H+	H+	H+	M+	M+	This policy promotes safe, sustainable and accessible transport including consideration of walking and cycling and safe and convenient access to public transport. The policy is considered to have high positive impacts on women, younger people and older people who are the groups that are most likely to rely on public transport rather than having access to a private car. Disabled people would also benefit from improved accessibility. The policy is considered to have a medium positive impact on all other groups.
LP45 Parking Standards and Servicing	L+	L+	M+	L+	L+	L+	This policy sets out the Council's parking standards. Consideration is given to the need for disabled parking provision so the policy is considered to have a medium positive impact on disabled people and a low positive impact on other equalities groups.
SITE ALLOCATIONS							
SA 1 Hampton Square, Hampton	M+	M+	M+	M+	M+	M+	Proposal for redevelopment to include community, retail, employment and residential uses, including affordable

Policy	Equalities categories						Commentary
	Race	Gender	Disability	Age	LGBT	Religion	
							units so could have a positive impact on all equalities groups.
SA 2 Platts Eyot, Hampton	L+	L+	L-	L+	L+	L+	Proposal for regeneration of the island with business, industrial and river related uses and appropriate residential development to enable the restoration of the Listed Buildings. This is an employment site that could offer different types of employment opportunities so could potentially be beneficial to all equalities categories, apart from the elderly who are unlikely to be seeking employment, however the island it is not an accessible location so disabled residents will potentially be excluded. Therefore it is considered to be of low positive impact for most groups but low negative impact for the disabled group.
SA 3 Hampton Traffic Unit, 60-68 Station Road, Hampton	M+	M+	M+	M+	M+	M+	Proposal for employment generating and other commercial or social and community infrastructure uses with a pedestrian link through the site. This is considered to have a medium positive impact on all equality groups in terms of accessibility, employment opportunities and community services.
SA 4 Hampton Delivery Office, Rosehill, Hampton	L+	L+	L+	L+	L+	L+	Appropriate land uses include employment generating or social and community infrastructure uses. This is considered to have a low positive impact on all equality groups. There is a Building of Townscape Merit to be retained on the site to which it may be difficult to make adaptations for

Policy	Equalities categories						Commentary
	Race	Gender	Disability	Age	LGBT	Religion	
							physical disability or the elderly.
SA 5 Telephone Exchange, Teddington	L+	L+	L+	L+	L+	L+	Proposal for retail and commercial use could potentially benefit small business owners. This is considered to have a low positive impact on all equality groups.
SA 6 Teddington Delivery Office, Teddington	L+	L+	L+	L+	L+	L+	Proposal for retail and commercial use could potentially benefit small business owners. This is considered to have a low positive impact on all equality groups.
SA 7 Strathmore Centre, Strathmore Road, Teddington	M+	M+	M+	H+	M+	M+	Proposal for social and community infrastructure uses. It protects the current use of the site as a nursery, which provides for a complete range of child-care services for children up to and including Year 6, as well as acting as a nursery to pre-school aged children. It is considered to have a medium positive impact on all other equality groups.
SA 8 St Mary's University, Strawberry Hill	M+	M+	M+	H+	M+	M+	Proposal for upgrading of St Mary's University and its associated teaching, sport and student residential accommodation. This is considered to have a high positive impact on younger residents in terms of educational opportunities and a medium positive impact on other equality groups.
SA 9 Richmond upon Thames College, Twickenham	L+	M+	H+	H+	L+	L+	Redevelopment to provide a replacement college, B1 technical hub a new secondary school and special education needs school, sports centre and residential including affordable housing. There is considered to be a

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							particular positive impact on younger people including children with special educational needs who would be using the educational facilities. Local employment opportunities could be beneficial for women and disabled people who may prefer local work in an accessible location.
SA 10 The Stoop (Harlequins Rugby Football Club), Twickenham	L+	L+	L+	M+	L+	L+	Continued sports uses with appropriate additional facilities including leisure, hotel or business uses. The proposal could potentially benefit everyone, particularly young people who may be encouraged to use the sport and leisure facilities.
SA 11 Twickenham Stadium, Twickenham	L+	L+	L+	M+	L+	L+	Continued sports uses with appropriate additional facilities including indoor leisure, hotel or business uses as well as hospitality and conference facilities. . The proposal could potentially benefit everyone, particularly young people who may be encouraged to use the sport and leisure facilities.
SA 12 Mereway Day Centre, Mereway Road, Twickenham	M+	M+	M+	M+	M+	M+	Social and community infrastructure uses are considered the most appropriate uses for this site. These types of uses are very important in community wellbeing and inclusivity, access-for-all and co-location is particularly encouraged in these types of uses therefore this proposal is considered to have positive impacts on all equalities groups.
SA 13 Telephone Exchange, Whitton	M+	M+	M+	M+	M+	M+	Appropriate land uses include employment and social infrastructure or

Policy	Equalities categories						Commentary
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							other town centre uses. This could potentially be beneficial for all equalities groups.
SA 14 Kneller Hall, Whitton	H+	H+	H+	H+	H+	H+	Redevelopment for residential, employment and community facilities is proposed. High quality open spaces should be provided and the playing fields retained. The proposed uses on this large site have the potential to benefit all equalities groups, and this is particularly valuable in Whitton which is identified as one of the relatively more deprived centres of the borough.
SA 15 Ham Close, Ham	M+	M+	M+	M+	M+	M+	Comprehensive regeneration of the area including additional new housing. This is known to be an area of deprivation so provided there is no displacement of any of the existing residents this scheme could potentially be highly beneficial for all equalities groups living in the area and also the new residents.
SA 16 Cassel Hospital, Ham Common, Ham	H+	H+	M+	M+	H+	H+	Social and community infrastructure uses are considered the most appropriate uses for this site. These types of uses are very important in community wellbeing and inclusivity, access-for-all and co-location is particularly encouraged in these types of uses therefore, particularly given the substantial floorspace of this site, this proposal is considered to have high positive impacts on all equalities groups. There are listed buildings on this site and, as noted elsewhere, this

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	Race	Gender	Disability	Age	LGBT	Religion	
							can lead to access difficulties in terms of adapting the buildings with lifts etc for wheelchair use or the elderly, and whilst this is not considered to outweigh the benefits, the rating for the age and disability group has been downgraded from high positive to medium positive.
SA 17 St Michael's Convent, Ham Common, including new OOLTI designation	H+	H+	M+	M+	H+	H+	Appropriate land uses include employment and social infrastructure or other town centre uses. These uses encourage community wellbeing and therefore this proposal could potentially have medium positive impacts on all equalities groups. There are listed buildings on this site and, as noted elsewhere, this can lead to access difficulties in terms of adapting the buildings with lifts etc for wheelchair use or the elderly, and whilst this is not considered to outweigh the benefits of the proposal, the rating for the age and disability group has been downgraded from high positive to medium positive.
SA 18 Ryde House, East Twickenham	M+	M+	M+	H+	M+	M+	This proposal prioritises a two form entry primary school which will help to meet demand for education provision in the area, providing high positive impacts on children. Retail elements of the proposal are considered to provide a medium positive impact on all groups.
SA 19 Richmond Station, Richmond	M+	H+	H+	H+	M+	M+	Comprehensive redevelopment to provide an improved transport interchange which would presumably incorporate accessibility improvements, benefitting those with mobility

Policy	Equalities categories						Commentary
	Race	Gender	Disability	Age	LGBT	Religion	
							difficulties. This scheme would regenerate the area around the station and the provision of a variety of town centre uses including retail, employment and social infrastructure in close proximity to the train station is particularly beneficial to those who are more dependent on public transport such as women, older, younger and disabled people.
SA 20 Friars Lane Car Park, Richmond	M+	M+	M+	M+	M+	M+	Redevelopment for housing, including affordable, would provide new homes that would be available for all groups.
SA 21 Sainsbury's, Lower Richmond Road, Richmond	L+	M+	M+	M+	L+	L+	Comprehensive redevelopment to provide for retail and residential uses. This is considered to have benefits for all equalities groups in terms of housing provision and easy access to retail facilities.
SA 22 Pools on the Park and surroundings, Old Deer Park, Richmond	M+	M+	M+	H+	M+	M+	Continued use of the site for sports facilities, particularly a publicly accessible swimming facility, with potential additional leisure facilities would benefit all groups in terms of access to sports facilities, and particularly younger people.
SA 23 Richmond Athletic Association Ground, Old Deer Park, Richmond	L+	L+	L+	M+	L+	L+	Continued use of this site for sports uses could potentially benefit everyone, particularly young people who may be encouraged to use the sport and leisure facilities.
SA 24 Stag Brewery, Lower Richmond Road, Mortlake	M+	M+	H+	H+	M+	M+	Comprehensive redevelopment of the site. The provision of a mixed use scheme could positively impact on those with mobility difficulties including

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							disabled people and the elderly who could benefit from a mix of facilities close by in an area well served by public transport. The provision of an on-site new 6-form entry secondary school will particularly benefit young people. The community and health facilities will benefit everyone but particularly younger, older and disabled people and the sport and leisure uses are considered to particularly benefit younger people.
SA 25 Mortlake and Barnes Delivery Office	M+	M+	M+	M+	M+	M+	Appropriate land uses include employment or other commercial and retail uses. This could potentially be beneficial for all equalities groups.
SA 26 Telephone Exchange, East Sheen	M+	M+	M+	M+	M+	M+	Appropriate land uses include employment, commercial and community and social infrastructure uses. This could potentially be beneficial for all equalities groups.
SA 27 Kew Biothane Plant, Mellis Avenue, Kew	M+	M+	M+	M+	M+	M+	Redevelopment of the site to provide for residential uses, including affordable housing, would provide new homes that would be available for all groups.
SA 28 Barnes Hospital, Barnes	M+	M+	M+	H+	M+	M+	Appropriate land uses include social and community infrastructure uses including a two form entry primary school. This is considered to be particularly beneficial for the younger age group and the co-location of community uses on the site would benefit all equalities groups.