

Equality Impact and Needs Analysis of the Local Plan Regulation 18 Consultation Version

Planning

10 December 2021

SSA EQUALITY IMPACT AND NEEDS ANALYSIS

Directorate	Environment and Community Services
Service Area	Planning Policy and Design
Service/policy/function being assessed	Richmond Local Plan
Which borough (s) does the service/policy apply to	Richmond
Staff involved	Louis Osman, Andrea Kitzberger-Smith
Date approved by Directorate Equality Group (if applicable)	N/A
Date approved by Policy and Review Manager All EINAs must be signed off by the Policy and Review Manager	Sent to Andrew Hagger on 19.10.2021 and 5.11.2021
Date submitted to Directors' Board	19.10.2021

SUMMARY

The Council's new Local Plan will set out policies and guidance for the development of the borough over the plan period of 2024 to 2039. The new Local Plan, with a key focus on tackling the climate change and 'living locally', will also protect and enhance other aspects of life in Richmond - its culture, community, heritage and character, open space, quality parks, schools, neighbourhood character and thriving small businesses.

The policies within the Local Plan promote equality and inclusivity for all. This assessment has identified several positive impacts for the various protected characteristics. Overall, a number of protected characteristics will benefit from the focus on 'living locally', providing access for daily needs for all as part of the 20-minute neighbourhood concept as well as the policy on sustainable travel choices, with its focus on walking and cycling. Children and younger people benefit from policies enhancing open spaces and play spaces, encouraging an active and healthy lifestyle, as well as the promotion of leisure and cultural facilities. Separately, the focus on maximising housing delivery, including affordable housing, will benefit younger and lower-income groups. The elderly population are more susceptible to health issues and likely to suffer from social isolation, therefore benefitting from policies which improve the standards of Community and Social Infrastructure, promote Health and Wellbeing, and protect open spaces and local shops and services, such as in our town, local and neighbourhood centres and shopping parades. Disabled residents benefit from Local Plan policies guaranteeing specialist housing, accessible and inclusive urban design and disabled parking spaces. For the LGBT group, some Local Plan policies are considered to have a positive impact, for example the policies on Managing Impacts and on Local Character and design quality consider safety and accessibility and asks that developers minimise opportunities for crime and antisocial behavior, and the floodlighting and external artificial lights policy focuses also on safety lighting. Pregnant women and those on maternity are considered to benefit from policies regarding the accessibility of transport and ensuring a mix of housing types and sizes.

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

1. Background

Briefly describe the service/policy or function:

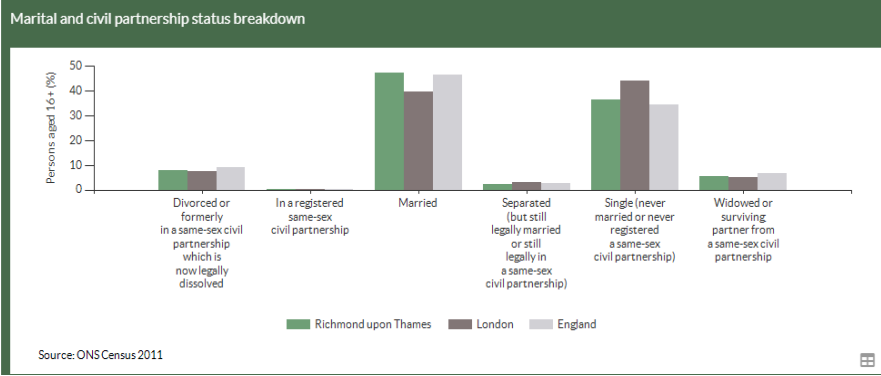
This document is the first stage in the process of developing a new Local Plan, known as the Regulation 18 stage or pre-publication version. This draft Local Plan outlines the Council’s new spatial strategy, vision, and objectives together with the area strategies and policies to deliver the spatial strategy.

The new Local Plan, once adopted, will replace the existing 2018 Local Plan as well as the Twickenham Area Action Plan (2013).

2. Analysis of need and impact

Protected group	Findings
Age	<div data-bbox="491 1290 1370 1615"> <p>Population projection for all persons by 5-year age group</p> <p>Date: 2020 Source: GLA</p> </div> <ul style="list-style-type: none"> - Richmond borough has a lower prevalence of children overweight when compared with London and England. The Local Plan will continue to support and encourage a healthy and active lifestyle by protecting green spaces and encouraging active transport, particularly cycling and walking. This will be achieved through policies on ‘living locally’, sustainable travel choices, green infrastructure, urban greening, sport and recreation as well as playspace policies, all of which will be of benefit to young people and the elderly in particular. - Regarding business and jobs, the policies seek to protect offices, industrial land and in general they promote jobs and the local economy; they will also help to ensure affordable workspaces are available, which will

Protected group	Findings
	<p>particularly benefit SMEs and start-ups. In addition, we will encourage greater economic floorspace and flexible working areas, which will benefit young entrepreneurs by making operating a business more affordable and convenient.</p> <ul style="list-style-type: none"> - The median price of Richmond’s property is much higher than the London average. To support those unable to afford to rent or buy in the borough, the Council will do everything in its power to make sure over the plan period we hit the 50% affordable housing target. This will support many protected characteristics, particularly those on no or low incomes. - Richmond borough has one of the highest proportions of elderly residents in London, and this will only increase as a result of improvements to life expectancy. There is likely to be an increase in need of specialist housing options due to higher levels of disability and health issues amongst older people, as well as greater accessibility on our highstreets. The design and living locally policies, together with policies seeking improvements to high streets and creating sustainable travel choices (including the work of the Council’s Local Implementation Plan) will also be of benefit. - Over a third of people aged over 65 are living alone across the country, which increases the risk of social isolation. The Local Plan will continue to enhance social infrastructure and ensure buildings consider the need for flexible use where possible to hold community events, thus encouraging social interaction. <p>Source: https://www.datarich.info/</p>
Disability	<ul style="list-style-type: none"> - An estimated 21,500 (11.5%) of the Richmond population has a long-term health problem or disability affecting day to day activities. To put this into perspective, the figure is 14.1% in London and 17.6% in England. This is a smaller proportion of residents than London and England. - Disabled residents generally have specialist housing needs, which have been considered in the Local Housing Needs Assessment and offering mixed Housing. It is important we also ensure housing built is accessible, adaptable, and wheelchair user friendly, ensuring adequate supply in the process. - 2% of people in Richmond aged 16-74 consider themselves to be economically inactive due to permanent sickness or disability. The Local Plan will look to support these individuals through greater access to workspaces and facilities by encouraging mixed-use developments. - Transport policies of the Local Plan together with other Council initiatives, such as the Council’s Local Implementation Plan, will continue to set out how the borough will improve provisions for disabled residents to access public transport. <p>Source: https://www.datawand.info/equalities/</p>
Gender (sex)	<ul style="list-style-type: none"> - The gender split in the borough is almost equal, at 48.7% men and 51.3% women. - Women generally have lower levels of access to private cars and are more reliant on public transport and other methods of transport. Transport policies and specifically those promoting sustainable travel choices have a positive impact on this group. - Women tend to have childcare responsibilities more often than men. The Local Plan’s town centre policies protect and enhance the borough’s

Protected group	Findings																												
	<p>hierarchy of centres, and support their adaptation to meet future needs. The 'living locally' policy focuses on ensuring that daily needs can be met within a 20-minute neighbourhood. This would have a positive impact on women as local shops and parades are convenient for buying necessities and do not require much travel. In addition, the provision of green and open spaces such as play areas will benefit childcare and promote an active lifestyle.</p> <p>Source: https://www.datawand.info/equalities/</p>																												
<p>Gender reassignment</p>	<ul style="list-style-type: none"> - Borough-level data on Gender Reassignment is sparse. - It is known that the Trans community experience disproportionate levels of discrimination. A National LGBT Survey conducted by the Government Equalities Office highlighted a number of concerns regarding safety. Over half of trans respondents admitted that they tried not to be openly trans because of how people behave towards them. - The Urban Design Study that has been carried out in support of the Local Plan considers safety and accessibility and the policies ask that developers minimise opportunities for crime and antisocial behaviour, this will have a positive impact on Trans people and help them to feel safer on a day-to-day basis. Work will have to be done with developers to ensure safety measures are enacted upon in their work. <p>Source: National LGBT Survey https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/730417/lgbt-survey-easy-read-lo-res_v2.pdf</p>																												
<p>Marriage and civil partnership</p>	 <p>The chart shows the following approximate percentages for persons aged 16+:</p> <table border="1"> <thead> <tr> <th>Category</th> <th>Richmond upon Thames (%)</th> <th>London (%)</th> <th>England (%)</th> </tr> </thead> <tbody> <tr> <td>Divorced or formerly in a same-sex civil partnership which is now legally dissolved</td> <td>~8</td> <td>~8</td> <td>~8</td> </tr> <tr> <td>In a registered same-sex civil partnership</td> <td>~1</td> <td>~1</td> <td>~1</td> </tr> <tr> <td>Married</td> <td>~48</td> <td>~40</td> <td>~45</td> </tr> <tr> <td>Separated (but still legally married or still legally in a same-sex civil partnership)</td> <td>~2</td> <td>~2</td> <td>~2</td> </tr> <tr> <td>Single (never married or never registered a same-sex civil partnership)</td> <td>~35</td> <td>~45</td> <td>~35</td> </tr> <tr> <td>Widowed or surviving partner from a same-sex civil partnership</td> <td>~5</td> <td>~5</td> <td>~5</td> </tr> </tbody> </table> <p>Source: ONS Census 2011</p> <ul style="list-style-type: none"> - The majority of people in the borough are married or single (never married or never registered a same-sex civil partnership), with marriage higher than London average. - Those within this category are not considered to be affected differently by the policies within the Local Plan. 	Category	Richmond upon Thames (%)	London (%)	England (%)	Divorced or formerly in a same-sex civil partnership which is now legally dissolved	~8	~8	~8	In a registered same-sex civil partnership	~1	~1	~1	Married	~48	~40	~45	Separated (but still legally married or still legally in a same-sex civil partnership)	~2	~2	~2	Single (never married or never registered a same-sex civil partnership)	~35	~45	~35	Widowed or surviving partner from a same-sex civil partnership	~5	~5	~5
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<p>Pregnancy and maternity</p>	<ul style="list-style-type: none"> - Women generally have lower levels of access to private cars and are more reliant on public transport and other methods of transport. Transport policies and specifically those promoting sustainable travel choices have a positive impact on this group. The 'living locally' policy focuses on ensuring that daily needs can be met within a 20-minute neighbourhood. - Pregnant women and their growing families require adequate space. Housing policy that ensures an adequate mix of housing types and sizes will be beneficial to this protected group. 																												

Protected group	Findings
<p>Race / ethnicity</p>	<ul style="list-style-type: none"> - The projected Black Asian and Minority Ethnic population in the borough as of 2020 is 16.2% (32,608 residents). Richmond is far less ethnically diverse than London (43.5% BAME projected), but more diverse than England (14.6% BAME). - The ethnic group profile of the borough is displayed in the chart below: <div data-bbox="571 454 1396 750" style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p style="text-align: center; background-color: #4a7c59; color: white; padding: 2px;">Projected ethnic makeup</p> <p style="font-size: small; text-align: center;">Date: 2020 Source: GLA</p> </div> - There is a significant difference between employment rates of different racial groups. 83.7% of the white population are employed, compared to 71% of ethnic minorities. Ethnic minorities generally have lower income levels than their white counterparts. This has several implications in terms of policy and the needs of Black Asian and Minority Ethnic people. - Policies that encourage the creation of jobs have a positive impact on Black Asian and Minority Ethnic people with higher rates of unemployment (policies under Increasing Jobs section). - Black Asian and Minority Ethnic people are generally on a lower income and therefore benefit from Housing Policies that require affordable housing, including 50% affordable housing requirement as well as seeking affordable housing contributions from small sites. - Ethnic minorities are more likely to have issues accessing suitable housing and to have overcrowded homes due to living with extended family. Housing policies in the Local Plan seek to ensure an adequate mix of Housing types and sizes across the borough, and will provide benefits for Black Asian and Minority Ethnic residents. <p>Source https://www.datawand.info/equalities/</p>
<p>Religion and belief, including non-belief</p>	<ul style="list-style-type: none"> - There are a range of religions and beliefs in the borough. The below table from the 2011 census shows the expressed religious denominations of residents of Richmond in comparison to London and England. <div data-bbox="440 1503 1385 1917" style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p style="text-align: center; background-color: #4a7c59; color: white; padding: 2px;">Religion Richmond upon Thames</p> <p style="text-align: center; background-color: #4a7c59; color: white; padding: 2px;">Religion breakdown</p> <p style="font-size: small; text-align: center;">Source: ONS Census 2011</p> </div> - The policy on improving the community infrastructure and spaces states that the Council will work to ensure that adequate, high quality social and community facilities and services are developed and/or modernised to

Protected group	Findings
	<p>meet the changing needs of the community, such as mixed-use developments. This will have a positive impact on faith groups as this policy encompasses faith facilities and religious meeting places.</p> <p>Source https://www.datawand.info/equalities/</p>
Sexual orientation	<ul style="list-style-type: none"> - Borough-level data on Sexual Orientation is sparse. - It is known that the LGBTQ community experience disproportionate levels of discrimination. - A National LGBT Survey was conducted by the Government Equalities Office: 4 out of 10 respondents said they'd had a bad experience outside their home in the last 12 months because they were LGBT and Over 2 thirds of the respondents said they didn't hold hands with their partner in public because they were frightened about what people might say. - The design policies promote safety and accessibility and asks that developers minimise opportunities for crime and antisocial behaviour, this will have a positive impact on the LGBT community and help them to feel safer on a day-to-day basis. The policy on floodlighting and external artificial lighting also considers the benefits to be gained for safety of movement. <p>Source National LGBT Survey: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/730417/lgbt-survey-easy-read-lo-res_v2.pdf</p>

Data gaps.

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

3. Impact

Protected group	Positive	Negative
Age	<ul style="list-style-type: none"> - People of all age groups will benefit from the Housing Needs of Different Groups policy, where high standards of accessibility and inclusivity need to be met, and adaptations to changing circumstances need to occur quickly. - The elderly, who often have mobility issues, would benefit from the design policies, such as providing greater access to publicly accessible properties and riverside locations, as well as general improvements to the 	<ul style="list-style-type: none"> - The policies on protecting the borough's heritage sites could be of detriment to the elderly, as a lot of heritage sites are very old, and sometimes do not cater for people with mobility issues. The Council will have to ensure that they balance the needs of the elderly with preserving heritage sites. - The Local Plan acknowledges that there is a high value on land in Richmond. It is vitally important in this context to ensure community facilities are not priced out by other uses which have higher land values, to the detriment of young and older

Protected group	Positive	Negative
	<p>public realm and sustainable travel choices.</p> <ul style="list-style-type: none"> - Policies that encourage development and provision of affordable housing have a positive impact on people on no and low incomes, due to increased housing demand. This could also be younger age groups. - Policies on tackling the climate emergency, such as reducing waste and adopting a more Circular Economy, will have a positive impact on all age groups, but in particular on the elderly and children, as it ensures development proposals do not have detrimental effects on resident’s health. - The policies on supporting our town and local centres to adapt, as well as on living locally will benefit several age groups. Younger residents benefit from more education, training, social and leisure facilities e.g. youth clubs and job opportunities more locally. Similarly, community facilities that are accessible and have good transport links have a positive impact on the elderly, encouraging community events and thus reducing social isolation. - Policies protecting the borough’s green spaces have a positive impact on children and young people in regard to physical health, wellbeing and development, but also families when using play areas. - Transport policies, particularly on sustainable travel choices, ensure that public transport is widespread and accessible, as well as encourage healthier methods such as walking and 	<p>residents that rely on them. In addition, the Council has to ensure that proper affordable housing is available and provided to meet the 50% target, as this would otherwise be detrimental to young people and those on no or low incomes. In order to mitigate these risks, the Council should ensure the existing Infrastructure Delivery Plan is regularly reviewed and updated, and monitored closely to keep track of current stock of social and community facilities. The Council can also seek section 106 planning obligations to ensure proposed developments meet demand on existing community infrastructure and services.</p>

Protected group	Positive	Negative
	<p>cycling, are beneficial to the elderly population.</p>	
Disability	<ul style="list-style-type: none"> - The living locally policy as well as the town centres policies that focus on providing community facilities and services that are accessible and have good transport links have a positive impact on disabled residents. - Policies on play areas have a positive impact on this group as play spaces are designed to be inclusive and provide facilities for children of all abilities. - Housing Needs of Different Groups has a positive impact on disabled people as it states that housing must be designed to be inclusive and accessible to all. New buildings must be well insulated and ventilated to avoid any health problems as a result of damp, heat and cold. - The living locally policy has a positive impact on people with mobility issues who would benefit from having a variety of facilities and services within close proximity to meet their daily needs. - Transport policies, particularly on sustainable travel choices, are beneficial to people with mobility issues as they are more accessible and it allows residents to access town centres more conveniently. 	<ul style="list-style-type: none"> - The policies on Heritage Sites seeks to conserve features that contribute to the Heritage Asset or Historic Environment’s significance and character. There is potential that there may be a clash between upholding this part of the policy and the need to make adaptations to Listed Buildings in order to meet the needs of disabled people e.g. ramps. The chances of this are low and the Council officer assigned to the planning application can exercise their discretion if this was to occur.
Gender (sex)	<ul style="list-style-type: none"> - Women, who most often have caring responsibilities for children, would benefit from accessibility of developments and good local transport links. - Policies promoting jobs and local employment opportunities will have a positive impact on women who often have caring responsibilities and may need to 	<ul style="list-style-type: none"> - There are certain groups that are at a higher risk of hate crimes, harassment and attacks, including women. To mitigate this issue, the Council should work with developers to ensure that they include safety and security measures early in the design process and that these are followed through. The Local Character and Design Quality policy does state that developments should minimize opportunities for

Protected group	Positive	Negative
	<p>work part time, as well as close to home.</p> <ul style="list-style-type: none"> - Transport policies, particularly on sustainable travel choices, that ensure public transport is widespread and accessible have a positive impact on women with childcare responsibilities who are less likely to have access to a car and rely on public transport. 	<p>crime and antisocial behavior, but extra consideration should be given in the context of protected groups.</p>
Gender reassignment	<ul style="list-style-type: none"> - The Local Character and Design Quality policy has a positive impact on Trans people who experience disproportionate levels of discrimination. It promotes safety and accessibility and asks that developers minimise opportunities for crime and antisocial behaviour, which will help Trans people feel safer in the borough. 	<ul style="list-style-type: none"> - There are certain groups that are at a higher risk of hate crimes, harassment and attacks, including the LGBTQ community. The Council needs to ensure that the criteria set out in Local Character and Design Quality are implemented with regard to ensuring anti-social behaviour and crime is prevented as much as possible. - The National LGBT Survey found that a lot of trans respondents said their needs were not considered when they accessed general healthcare services. Although new developments are required to consider greater access and inclusivity, it is not clear whether existing developments need to adhere to this requirement. This could have a negative impact on the Trans community, who require facilities such as gender-neutral toilets. This impact can be mitigated by adding a line into the policy about inclusivity.
Marriage and civil partnership	<ul style="list-style-type: none"> - Those within this category are not considered to be affected differently by the policies within the Local Plan. 	<ul style="list-style-type: none"> - Those within this category are not considered to be affected differently by the policies within the Local Plan.
Pregnancy and maternity	<ul style="list-style-type: none"> - The Housing policies have generally a positive impact on people within this category as developers are encouraged to provide a range of home sizes, beneficial to a person with a family that may need a larger home. - The sustainable travel choices as well as living locally policies are beneficial to pregnant women as 	<ul style="list-style-type: none"> - No negative impact is anticipated for this group.

Protected group	Positive	Negative
	<p>they ensure daily needs can be met close to home and do not require long distance travel.</p>	
<p>Race / ethnicity</p>	<ul style="list-style-type: none"> - Policies that encourage the creation of more homes at an affordable cost have a positive impact on people from Black Asian and Minority Ethnic backgrounds who are generally on lower incomes. - The introduction of more community facilities will benefit different groups, as each has differing needs and this policy encourages adequate provision of services. - The Housing Mix and Standards policy has a positive impact on Black Asian and Minority Ethnic people as it encourages housing developments to provide a range of dwelling sizes. For example, Asian families are more likely to live in an extended family unit so would require more space. - Black Asian and Minority Ethnic people will benefit from training, apprenticeship opportunities and local employment opportunities in the Employment policies section. - The Housing Needs of Different Groups policy seeks to protect the existing Gypsy and Traveller site in the borough, which is a positive impact on people from this ethnic group, and the research will be reviewed on future needs. 	<ul style="list-style-type: none"> - There are certain groups that are at a higher risk of hate crimes, harassment and attacks, including ethnic minorities. This could be an issue with new developments if a commitment to safety features isn't followed through i.e. by providing security features, well-lit walking routes and good surveillance. To mitigate this issue, the Council should work with developers to ensure that they include safety and security measures early in the design process and that these are followed through.
<p>Religion and belief, including non-belief</p>	<ul style="list-style-type: none"> - The policies on social infrastructure as well as living locally are likely to have a positive impact across different faith groups. - The Housing Needs of Different Groups policy could serve to accommodate those in religious groups who may share a 	<ul style="list-style-type: none"> - The Local Plan acknowledges that there is a deficiency in terms of community facilities. In the current Covid-19 context, there is a risk that community facilities could be priced out by other uses which have higher land values, to the detriment of religious groups that are dependent on these facilities. In order to mitigate

Protected group	Positive	Negative
	<p>property with multiple generations of the family, which will be of benefit to these groups.</p>	<p>this risk, the Council should ensure the Infrastructure Delivery Plan is regularly updated and monitored closely to keep track of current stock of social and community facilities. The Council can also seek section 106 planning obligations to ensure proposed developments meet demand on existing community infrastructure and services.</p> <ul style="list-style-type: none"> - There are certain groups that are at a higher risk of hate crimes, harassment and attacks, for example Muslims. There needs to be a concerted effort by the council to ensure developments contribute to a sense of safety for the people in these vulnerable groups i.e. by providing security features, well-lit walking routes and good surveillance. To mitigate this issue, the Council should work with developers to ensure that they include safety and security measures early in the design process and that these are followed through.
<p>Sexual orientation</p>	<ul style="list-style-type: none"> - The design policies have a positive impact on LGBT people who experience disproportionate levels of discrimination. It promotes safety and accessibility and asks that developers minimise opportunities for crime and antisocial behaviour, which will help LGBT people feel safer in the borough, particularly at night-time – the Managing Impacts policy may specifically help with considering mitigation. 	<ul style="list-style-type: none"> - There are certain groups that are at a higher risk of hate crimes, harassment and attacks, including the LGBTQ community. The Council needs to work with developers to ensure that developments contribute to a sense of safety for the people in these vulnerable groups i.e. by providing security features, well-lit walking routes and good surveillance.

4. Actions

Action	Lead Officer	Deadline
<p>Add further explanation into the Social and Community Infrastructure policy’s supporting text that emphasises the need for facilities and services to be designed to be inclusive for all. This is especially important in the context of those within the Trans community who may require facilities such as gender-neutral toilets, and pregnant/maternity women who would need baby changing facilities.</p>	<p>Local Plan team</p>	

<p>Historic environment policies, including on designated and non-designated heritage assets need to keep in mind the needs of disabled people who may need adaptations made to buildings to suit their needs. Consider adding a reference in this regard.</p>	<p>Local Plan team</p>	
<p>In the context of the Night-Time Economy, the Council should work with developers to ensure that they include safety and security measures early in the design process. This is important to ensure the safety of Women, LGBTQ, and religious groups e.g. Muslims, who are at a higher risk of hate crimes and harassment.</p>	<p>Development Management team</p>	
<p>Council to ensure the existing Infrastructure Delivery Plan is regularly updated and monitored closely to keep track of current stock of social and community facilities.</p>	<p>Local Plan team</p>	

5. Consultation

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