

**LOCAL DEVELOPMENT FRAMEWORK**

# **Catford Town Centre Local Plan Further Options Report**

## **Equalities Analysis Assessment Report**

**May 2013**



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# 1. Introduction

## 1.1 Introduction

Catford is a diverse community made up of many different groups and individuals, therefore it is essential to try to understand the different contributions, perspectives and experience that people in our community have. We believe that the diversity of our population and workforce is one of our greatest strengths.

We also recognise that not everyone's experience is equal and there are many forms of discrimination affecting people's lives. Equality of opportunity and freedom from discrimination is a fundamental right for everyone.

This report sets out the findings of the Equalities Analysis Assessment (EqAA) of the Council's recommended options contained within the Further Options report for the preparation of a Catford Town Centre Local Plan (hereafter referred to as the Catford Plan). The proposed Development Plan is a number of adopted and emerging Local Plans which together will guide future development of the borough and includes the London Plan (2011), the Core Strategy (2011) and emerging Development Management Local Plan. The assessment of the Council's recommended options within the Further Options report was undertaken by the Planning Policy Team in the Regeneration Directorate, by Matthew Pullen, Policy Planner and has been evaluated by the Corporate Equalities Board.

## 1.2 Equalities Analysis Assessment - Purpose

An Equalities Analysis Assessment or EqAA enables a service or function to assess the possible implications on the whole community (including staff) when changes are proposed to the way a service is delivered, through policies, strategies, procedures, projects, reviews, organisational change or savings proposals.

Equality Analysis helps ensure that certain groups, individuals or staff are not excluded from services or practices. It also ensures that whole communities benefit from services which the Council delivers and new development/infrastructure or alterations to the built environment implemented by the Council or its partners.

In brief, the EqAA will help ensure that policies developed and implemented through a Catford Plan will contribute to improving the lives of local communities. This report represents the results of the assessment of the Further Options stage of the Catford Plan production process in relation to the potential impact on key equalities groups. Any requirements for amendments resulting from this assessment have been fed back into the Catford Plan production process and will affect the Catford Plan submission version.

### 1.3 Catford Plan

Lewisham Council is preparing a Catford Local Plan to ensure that the forecast growth for the centre is successfully managed and delivered. The vision for the town centre is provided by the Core Strategy (Spatial Policy 2), which states that the town centre will:

- a. be designated as a Major town centre with new development seeking to maintain and enhance its status, to secure its physical regeneration and ensure its continued contribution to the local night-time economy
- b. build on its role as the civic heart of the borough
- c. accommodate up to 22,000 square metres of additional retail floorspace by 2026
- d. accommodate 650 additional new homes by 2016 and up to 1,100 additional new homes by 2026
- e. be one of the borough's preferred locations for new office development.

The Catford Plan is one of a number of adopted and emerging Local Plans which together will guide future development of the borough and includes:

- Core Strategy (adopted June 2011)
- Site Allocations Local Plan (under preparation)
- Lewisham Town Centre Local Plan (under preparation)
- Development Management Local Plan (under preparation)
- Gypsy and Traveller's Site(s) Local Plan (under preparation)

It is anticipated that the Plan will be submitted to the Secretary of State for examination in October 2013 for adoption in May 2014. The Catford Plan is being prepared over a number of stages, including:

- Issues and Options – November 2005
- Preferred Options – July 2007

- Further Options – February 2013

The EqAA provides an assessment of the Further Options, which sets out a proposed vision, objectives and specific policies for Catford. The findings of this assessment are being used to help prepare the Plan itself

## 2. Methodology

2.1 The methodology for this assessment has been constructed using a combination of guidance from the London Borough of Lewisham's Comprehensive Equalities Scheme 2012-2016 and Equalities Analysis Assessment Toolkit (September 2011) and best practice from the EqAA into Lewisham's Core Strategy and other recent examples.

In general terms the report assesses the potential impacts of the emerging local plan policies by:

A. Reviewing the evidence, including;

- the relevant policy context
- the baseline information
- previous consultation responses.

B. Establish groups with protected characteristics

- Use the baseline evidence to establish the key groups of people with protected characteristics that are considered in this assessment.

C. EqAA

- Assess the potential level of impact of the Plan on each group for each policy, using a scale of high, medium and low.

D. Stakeholder Review

- Perform an internal and external key stakeholder review of the assessment results to ensure they are fair. This will include the Lewisham Council Corporate Equalities Board.

E. Produce Final Assessment

- Amend assessment as required in view of feedback and produce the detailed final report.



# 3. Policy review

## 3.1 National policy

In April 2010 the Government introduced new legislation in the form of the Equality Act 2010, replacing and consolidating a number of historic acts relating to equalities and discrimination. The Act requires that local authorities consider the three aims of the Equality Duty and document their rationale/assessment as part of the process of decision-making.

When making decisions the Council is required to have due regard to the need to:

- i. eliminate unlawful discrimination, harassment, victimisation
- ii. advance equality of opportunity; and
- iii. foster good relations.

## 3.2 Local equality policy

The Council's commitment to equality for citizens, service users and employees is 'Equality for All' - *Comprehensive Equalities Scheme (CES) 2012-16*. This is underpinned by a set of high level strategic objectives which incorporate the requirements of the Equality Act 2010: General Duty and Equality Act 2010: Public Sector Equality Duty (which contains Specific Duties).

The CES sets out the equality objectives that the Council will work towards over to 2016:

- **tackle** victimisation, discrimination and harassment;
- **improve** access to services;
- **close** the gap in outcomes for citizens;
- **increase** mutual understanding and respect between communities;
- **increase** participation and engagement.

This assessment accords with both the current legislative requirements and local policy.

## 4. Baseline information

- 4.1 The London Borough of Lewisham covers around 13.4 square miles, located in south east London. It is important to consider the baseline information for the whole borough, not just those resident within the town centre boundary, as those living elsewhere in the borough will interact with the centre through employment, shopping and leisure activities. The borough is made up of a collection of diverse neighbourhoods and strong communities ensuring that while the borough and its localities develop, they maintain their unique identities and preserve Lewisham's rich cultural, natural and architectural heritage.
- 4.1 The ward of Rushey Green is the best comparison to the area covered by the proposed Catford Plan and statistics for this ward have been used as a proxy for the overall area to be covered by the Plan. The Census statistics have been sourced from the Office National Statistics 2011 Neighbourhood Census Quick Statistics (64 datasets) and statistics for Rushey Green ward are presented alongside those for Lewisham as a whole and Greater London in order to set them in context. This baseline also draws on the 2010 Indices of Multiple Deprivation The GLA's 2012 Round of Demographic Projections are due to be released in 'Spring 2013' and were not available at the time that this Assessment was carried out. Some references are made to the 2011 Round of Projections.
- 4.1 Lewisham is a vibrant and ethnically diverse borough, and recent results from the 2011 Census tells us that it is home to almost 276,000 people and over 116,000 households. The population is expected to increase by approximately 25,000 people up to 2021, representing a significant rise. Within Rushey Green the increase in population expected is from 17,182 to 22,364 over this period, a 30% growth.<sup>1</sup>The borough is the 31<sup>st</sup> most deprived local authority area in England with pockets of deprivation in most wards, but especially concentrated in particular areas. One such area of deprivation is Catford town centre and its immediate surrounds which are among the 20% most deprived areas in the country.<sup>2</sup>

### 4.2 Gender

In Rushey Green, nearly exactly 50% of the population are female and 50% male, whereas the percentage for Lewisham and London as a whole are about 51% female and 49% male. However, this gender gap is actually a reduction compared to 2001, where there were almost 9,000 more females than males.

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<sup>1</sup> 2011 Round of Demographic Projections – GLA

<sup>2</sup> 2010 Indices of Multiple Deprivation

**4.3 Lone parents**

The Census 2011 showed that in the Ward of Rushey Green there were 762 lone parent families (12% of households). This is slightly more than Lewisham borough where there were 13,239 lone parent households with dependent children (11.4%) and significantly more than for London as a whole, where just 8.5% of households comprised lone parents.

**Black and minority ethnic communities**

Lewisham is a diverse borough, with the 2011 Census telling us that over 45% of the population comes from black and minority ethnic (BME) communities. In Rushey Green, the figure is about 59% - with about 38% of all residents being Black (Black African, Black Caribbean or Black Other). This compares with Lewisham's Black community comprising about 27% and the overall population of London being about 13% Black.

**4.4 Disability**

The 2011 Census shows that the population of Rushey Green has relatively high long-term health problems or disability.

	Rushey Green	Lewisham	London
Day-today activities limited a lot	8%	7%	6.5%
Day-today activities limited a little	8%	7%	7.5%
Bad Health	4.5%	3.9%	3.7%
Very Bad Health	1.5%	1.3%	1.2%

**4.5 Age**

The 2011 Census tells us that Rushey Green has a relatively young population, with a higher proportion of children and young adults and fewer older people than Lewisham or London.

	Rushey Green	Lewisham	London
0-19	27%	25%	24%
20-64	64%	65%	60%
65 and over	9%	10%	16%

**4.6 Sexual orientation**

In Britain there is relatively little national research on the lives of lesbians, gay men and bisexual people. The only nationwide surveys that have already provided

information on sexual orientation are the Census and the National Survey of Sexual Attitudes and Lifestyle (NSSAL).

The NSSAL in 2000 found that approximately 5% of men and women in Britain stated that they had ever had same-sex partners. This figure rose to over 10% for men and almost 7% for women who lived in London.

The 2011 Census tells us that of all residents aged 16+, 1,162 (0.5%) were in a Civil Partnership). For Rushey green, the number is 43 (0.4%).

In the meantime, there are various other estimates of the extent of the gay and lesbian population in Lewisham. Using central government’s guideline of 6% of the total population, the gay and lesbian population in Lewisham would be more than 16,500. This estimate does not include bisexual adults, or people who come to Lewisham to work or socialise, so the true extent of the LGB communities may well be greater than this. In 2009 a question on sexual orientation was included in the Council’s Residents Survey. Over 1,000 residents were randomly selected from across the borough to participate in these face-to-face interviews, of which 1% identified themselves as being gay, lesbian or bisexual (a drop from 2% in 2007).

**4.7 Religion and belief system**

The relatively large percentage of Black people from Africa and the Caribbean is reflected in the area’s range of religions and faiths. Lewisham and Rushey Green have a relatively high proportion of Christians and a low proportion of Muslim, Jewish and Sikh people. Although Christianity is clearly the most prevalent religion in Catford and in the borough, Lewisham also has a relatively high proportion of people (36.1%) either with ‘no religion’ or who did not state their religion when asked.

	Rushey Green	Lewisham	London
Christian	56%	53%	48%
Buddhist	0.7%	1.3%	1.0%
Hindu	2.9%	2.4%	5.0%
Jewish	0.1%	0.2%	1.8%
Muslim	7.6%	6.4%	12.4%
Sikh	0.2%	0.2%	1.5%
Other religion	0.4%	0.5%	0.6%
No Religion	22.3%	27.2%	20.7%
Religion not stated	9.7%	8.9%	8.5%

# 5. Groups with protected characteristics

## 5.1 Target Groups

Under the Equality Duty, the Council is required to consider groups with a number of protected characteristics. These are groups that are considered at risk of discrimination or are known to experience more inequality and disadvantage than others. These are the sectors of people that are more likely to be disadvantaged by a negative policy or less likely to obtain the benefits of a positive policy.

The following table shows the groups that have been identified for the purposes of the AAP EqAA.

**Table 5.1**

Equalities category	Key equalities groups	Need for Assessment
Gender (or sex)	<ul style="list-style-type: none"> <li>• Women</li> </ul>	<p>In order to balance both work and domestic responsibilities, many women require employment and training opportunities within easy reach of their residences. Higher levels of part-time work and lower average wages can mean that more women live in social housing and often in areas more susceptible to deprivation. Further, lone parent families find difficulties due to primary caring responsibilities.</p> <p>Safety and security is a paramount concern for women in regards to safe and accessible local services and transport networks.</p> <p>The Catford Further Options includes proposed policies relating to employment and mixed-use provision, transport and walking networks and public spaces that will be of particular importance to women.</p>
Race	<ul style="list-style-type: none"> <li>• Black and minority ethnic people</li> <li>• Gypsies and Travellers</li> </ul>	<p>Catford is both ethnically diverse and an area of strong deprivation. Racial discrimination is a major concern for BME groups. There are concerns about fear of crime, abuse and personal safety. Racial discrimination in the labour market and further employment and social issues including, language barriers and disrupted ethnic community ties are also apparent.</p>

5. Groups with protected characteristics

Equalities category	Key equalities groups	Need for Assessment
		<p>Key policies will relate to employment opportunities, town centre viability and public spaces.</p> <p>Gypsies and Travellers experience a lack of sites across London. Poor community relations between people of different ethnic and cultural backgrounds can potentially lead to conflict.</p>
Disability	<ul style="list-style-type: none"> <li>• Disabled people</li> </ul>	<p>A major concern for disabled people is accessibility in general and in particular to key facilities and services. It is important that transport networks, town centre layouts and public spaces are carefully provided and monitored. Public safety is also of paramount importance.</p> <p>Policies regarding transport and parking as well as shopping and public spaces will be of particular importance.</p>
Age	<ul style="list-style-type: none"> <li>• Young people and children</li> <li>• Older people</li> </ul>	<p>In deprived areas, children and young people can experience social exclusion, a lack of play facilities and public space. Additionally, the lack of services can lead to this group being susceptible to crime on the streets or public transport.</p> <p>Vital policies relate to public transport, safety in public spaces and the provision of social, community and leisure facilities.</p> <p>Similar to young people, older people are susceptible to safety and security concerns. Further, discrimination can occur in work increasing the likelihood of unemployment and living in deprived areas.</p> <p>Vital policies as with young people relate to public transport, safety in public spaces and the provision of social, community and leisure</p>

## 5. Groups with protected characteristics

Equalities category	Key equalities groups	Need for Assessment
		facilities. Additionally fair employment opportunity is required.
Sexual orientation	<ul style="list-style-type: none"> <li>• Lesbians</li> <li>• Gay men</li> <li>• Bisexual people</li> </ul>	Many policies could affect this group in some way. Of particular concern are those related to safety, crime and fear of crime in public spaces and on public transport. The availability and variety of housing is also a key concern.
Gender re-assignment	<ul style="list-style-type: none"> <li>• Trans people</li> </ul>	As above.
Faith	<ul style="list-style-type: none"> <li>• Different faith groups</li> </ul>	Access to suitable facilities for use as places of worship is the major issue for this group. Policies relating to social, community and leisure provision as well as mixed-use provision are of most concern.
Marriage and civil partnership	<ul style="list-style-type: none"> <li>• Married Couples</li> <li>• Gay and Lesbian civil partnerships</li> </ul>	Family and child safety and crime and fear of crime are of importance to this group. An appropriate amount and variety of housing, including affordable housing is also of importance.
Pregnancy and maternity		<p>The accessibility, in particular, of key facilities and services is important to this group. It is vital that transport networks, town centre layouts and public spaces are carefully provided and monitored. Public safety is also of paramount importance.</p> <p>Policies regarding transport and parking as well as the shopping and public spaces will be of particular importance.</p>

## **6. Creating the Further Options report**

### **6.1 Introduction**

After the Area Action Plan (AAP) Preferred Options report in 2007, there was a five year gap until the (now called) Local Plan was progressed, due to the former Government Office for London encouraging the Council to adopt the Core Strategy before proceeding further with any other plans.

### **6.2 Equalities Review**

Following the break, the Preferred Options report was informally reviewed and an assessment of all aspects, including equalities issues, undertaken before preparing the Further Options report (published in February 2013) and carrying out a further round of consultation. While this internal review was not a full EqAA, it benefitted from comments made by local people and groups in response to the earlier Issues and Options and Preferred Options (discussed in section 7) and the Equalities Impact Assessment that was carried out to inform the Core Strategy (published in February 2009) and it had significant input into the production of the options and alternatives set out in the Further Options report, including the Council's recommended options which are formally assessed later in this document.



# 7. Consultation

## 7.1 Introduction

The consultation on the emerging AAP/Local Plan at a number of stages in the production process is a statutory requirement and must be carried out according with the Statement of Community Involvement (SCI). The SCI was published in 2006 and can be found at:

<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/Pages/Statement-of-community-involvement-.aspx>

This section includes a brief summary of some of the key equalities principles that have been used in all rounds of consultation and a deeper analysis of the Further Options report consultation.

## 7.2 Consultation methods and principles

There have been public consultations on the proposed AAP/Local Plan at the Issues and Options stage, the Preferred Options stage and the Further Options stage. There will also be a further round of public consultation when the draft plan (the Proposed submission plan) is completed.

The Planning Service has a database of equality groups who were directly informed by post and/or email at the various consultation stages of preparing an AAP/Local Plan, including representatives of all the target groups identified in this EqAA. For each round of consultation the report has been sent to a number of key equality groups and where appropriate further meetings have been arranged with particular groups to discuss any specific equality, community or other matters required.

The Catford Local Plan Further Options report was made available for public consultation in February/March 2013 and followed the consultation methods and principles highlighted in the previous paragraphs. As part of this consultation process, a number of meetings were organised with various equalities groups. The key consultation events included: Prendergast College, Ladywell Fields (06-02-13); the Lewisham Pensioners Forum (12-02-13); Rushey Green Assembly (16-02-13); Catford South Assembly (28-02-13); Lewisham Disability Coalition (01-03-13) and an open event at Broadway Market (03-03-13). Invites for further discussion were sent to a number of other faith and culturally diverse groups, but no response was received.

### 7.3 Consultation results

At all stages of the AAP/Local Plan development process, the feedback received from equalities groups, via letter/e-mail or face-to-face at a meeting has been used to influence the development of the options for Catford and the subsequent draft policies.

Comments received from Preferred Options Consultation (January 2008) can be found by using the following link:

<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/catford/Pages/Preferred-options-report.aspx>

Comments from 19 local individuals and groups and from 11 public bodies and other interests were received in relation to the Further Options Consultation (which closed on 4 April 2013). Comments were also made at the meetings referred to in paragraph 7.2 above. These comments have been analysed and have been taken into account when undertaking the assessment set out in Section 8. The Pensioner's Forum (12-02-13) in particular raised a number of issues in relation to access to public toilet facilities and the need for adequate seating areas. The importance of Shopmobility schemes was also raised by both the Pensioners Forum (12-02-13) and the Lewisham Disability Coalition (01-03-13). A summary of all comments received will be made available on the Council's website in due course.

# 8. Assessment of the Further Options report

## 8.1 Introduction

This section details the EqAA undertaken of the Further Options / potential draft policies presented as part of the Local Plan Further Options report. The assessment is of the relevance and impact of each Further Option/ potential draft policy to each of the eight groups with protected characteristics. Where the policy option needs refinement to secure the identified positive impacts or where the identified negative impacts need mitigation, proposed refinements/mitigation measures are presented and the responsible group for delivery is identified. It should be noted that only the Council's recommended option in the Further Options report is assessed. The full results of the assessment can be found in Appendix 1 of this report, or a summary of the results can be found below in section 8.2.

## 8.2 Summary of findings

Overall, the Local Plan Further Options report is seen to have a positive impact upon equalities groups and issues in Catford. There are, however, a small number of potentially negative impacts that need mitigation and opportunities to refine policies to better address equalities issues.

### Positive Impacts:

- The proposed transport and traffic improvements and in particular the realignment of the **South Circular (A205)** should secure significant improvements in the legibility, accessibility and safety of the public realm, enhance public transport and significantly reduce severance.
- The proposed remodelling of the area including the retained street market and the redevelopment of the **Catford Centre and Milford Towers** should provide a safer and more accessible place, with a range of new housing to meet different needs (including more accessible homes) and public car parking that is designed and managed for those people who need it most.
- The civic and council and leisure uses proposed for the **Civic Centre** site would be positive for all groups and the provision of ground floor 'active frontages' should improve safety and reduce fear of crime.
- Redevelopment of **Laurence House** to include 'active' ground floor frontages should improve safety and reduce the fear of crime. The proposed range of new and additional housing should help meet different needs (including more

accessible homes) and additional community and/or leisure uses could provide additional opportunities for all groups.

- Redevelopment of the **Plassy Road Island** site should significantly improve natural surveillance of streets and open spaces and improve community safety and reduce fear of crime. Additional community and/or leisure uses could provide additional opportunities for all groups and the provision of a mix of new homes should help cater for different needs and increase the number of accessible homes. Additional public car parking spaces could also be managed to prioritise use by those who need it most.
- Redevelopment of the **Former Greyhound Stadium** site should secure significant improvements to the railway station environment and improved east-west pedestrian connectivity and a mix of new homes should help cater for different needs and increase access to assessable homes. Additional community and/or leisure uses could also provide additional opportunities for all groups.
- Redevelopment of the **Wickes and Halfords** site should deliver significant improvements to the attractiveness and safety of Waterlink Way and a mix of new homes should help cater for different needs and increase the number of accessible homes. Additional community uses could provide additional opportunities for all groups and new public car parking spaces could be managed to prioritise use by those who need it most.
- Additional **employment generating uses** and associated job and training opportunities would benefit key groups.
- The provision of a **mix of uses** on sites should improve natural surveillance of streets and other spaces throughout the day.
- The proposal to **limit new take-aways** within 400m of primary or secondary schools should have a positive impact on the health of young people.
- Ensuring that **shopfronts** provide suitable access for disabled people should help this group, together with older people, parents/carers and pregnant women and the sensitive design of **grilles and shutters** should help reduce the fear of crime.

- Safer and more inclusive **public realm** should have a positive impact on key groups.
- The provision of additional **infrastructure** to keep pace with growth would have a positive impact on key groups.

**Negative impacts:**

- The loss of a ground floor accessible public toilet from the Laurence House site.
- The raising up of development and evacuation arrangements in response to the risk of flooding.
- Microclimate conditions around the base of tall buildings.

**8.3 Summary of policy refinements/mitigation measures**

- A policy to secure the proposed traffic and transport improvements should explicitly require all changes to the public realm to ensure that opportunities are taken to make the environment more inclusive and safer for pedestrians, cyclists and public transport users and to reduce community severance.
- A policy for the redevelopment of the Catford Centre site should require the provision of dedicated accessible public toilets and baby-changing facilities and/or secure access to accessible WC facilities in new commercial premises. It should also make provision for a town centre shopmobility scheme.
- A policy for the Civic Centre site should require a ground floor accessible public toilet and bay-changing facility before the existing public toilet/facility in Laurence House is lost.
- Policies requiring public car parking on the Catford Centre, Plassy Road Island and Wickes and Halfords sites need to ensure that this would be accessible by lift (where necessary) and designed and managed in accordance with a Car Park Management Plan that prioritises use by disabled people and those with children.
- Policies to promote economic growth and manage employment uses should include a requirement for the design of all new non-residential development to be designed in accordance with London Plan Policy 7.2 (An Inclusive Environment).

- A policy on Employment Use which encourages hotel development should make reference to London Plan Policy 4.5, which seeks to ensure that at least 10% of hotel rooms are wheelchair accessible.
- A policy relating to the design of the public realm should ensure that, where appropriate, the design of new spaces includes opportunities for people to socialise and play.
- A policy on tall buildings should ensure that the wind and shadow environment of amenity space around such buildings is comfortable for walking and sitting.
- A policy relating to social infrastructure should include a requirement for the design of all new social infrastructure to be designed in accordance with London Plan Policy 7.2 (An Inclusive Environment).

# 9. Conclusions and monitoring

## 9.1 Introduction

This report is an EqAA and has followed standard procedures for the production of such a report to ensure a fair and appropriate assessment has been performed. In brief, it has assessed each of the Council's recommended options in the Catford Town Centre Local Plan Further Options Report against nine protected characteristics.

## 9.2 Summary of findings

It has been seen that a number of the Council's recommended options in the Further Options report will have a positive impact upon protected characteristics when they are delivered. The planned development will bring a number of improvements to the town centre, including enhanced accessibility, greater community and leisure opportunities, better housing choice and design led safety schemes.

It has not been deemed necessary to remove any of the further options on equalities grounds. However, a total of three potentially negative policy impacts have been identified, relating to the loss of a ground floor accessible public toilet from the Laurence House site, the raising up of development and evacuation arrangements in response to the risk of flooding and microclimate conditions around the base of tall buildings.

The EqAA has recommended appropriate mitigation measures to address these potential negative impacts and a number of policy refinements to defend those groups with protected characteristics.

## 9.3 Monitoring

The Council understands the importance of monitoring the implementation of plans and developments to ensure that the findings of this assessment are put in place. Relevant measures have been included in the Local Plan draft plan monitoring framework to monitor this fact.

Monitoring arrangements in the Lewisham Annual Monitoring Report (AMR) will enable the Council to examine and assess more closely the implementation of policies in the Local Plan once they are adopted, and how they impact on equalities issues. This monitoring will include the equalities measures identified through this assessment and included in the Local Plan monitoring framework. They will be undertaken by the Planning Management Team, Resources and Regeneration Management Team, the Corporate Equalities Board and Mayor and Cabinet.

## Appendix 1a: Major Town Centre Sites

Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group
CLP Recommended Option 1: Traffic and transport including the South Circular	↑	↑	↑	↑	↑	↑	↔	↔	↑	Opportunity to secure significant improvements in the legibility, accessibility and safety of the public realm, to enhance public transport and to significantly reduce severance.	See comments on CLP Recommended Option 21.	LBL Planning and Transport for London
CLP Recommended Option 2: Catford Centre and Milford Towers	↑	↑	↑	↑	↑	↑	↔	↔	↑	<p>The street market is particularly relevant for BAME groups and its retention is positive.</p> <p>The provision of ground floor 'active frontages' should improve safety and reduce fear of crime.</p> <p>Inclusion of replacement public car parking provides opportunity to</p>	<p>Include dedicated accessible public toilet/ baby-changing facilities and/or secure public access to accessible wc facilities in new commercial premises – particularly relevant for older people and pregnant women.</p> <p>Make adequate</p>	LBL Planning and LBL Property



**Appendix 1a: Major Town Centre Sites**

Appendix 1a: Major Town Centre Sites												
↔ = Little or no relevance to protected characteristics		↑ = Positive impact upon protected characteristics					↓ = Negative impact upon protected characteristics					
Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group
										ensure that it is designed and managed for those people that need it most. Provision of a mix of new homes should help cater for different needs and increase access to assessable homes (Lifetime Homes and wheelchair accessible).	provision for a town centre shop mobility scheme. Ensure that public car parking on upper floors is accessible by lift. Car park management plan to prioritise use by disabled people and those with children (See CLP Recommended Option 24).	
CLP Recommended Option 3: Civic Centre	↑	↑	↑	↑	↑	↑	↔	↑	↑	The street market is particularly relevant for BAME groups and its retention is positive. The provision of ground floor 'active frontages' should improve safety	Include an accessible public toilet and baby-changing facility on the ground floor of the proposed council offices before the existing public toilet on the	LBL Planning, LBL Property and TfL

**Appendix 1a: Major Town Centre Sites**

Appendix 1a: Major Town Centre Sites													
↔	= Little or no relevance to protected characteristics				↑	= Positive impact upon protected characteristics				↓	= Negative impact upon protected characteristics		
Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group	
										and reduce fear of crime. Proposed civic and council and leisure uses would be positive for all groups (including a possible registry office). Opportunity to re-provide the ground floor accessible public toilet that would be lost from Laurence House.	Laurence House site is lost.		
CLP Recommended Option 4: Laurence House	↑	↑	↑	↓	↑	↑	↑	↔	↓	Loss of existing ground floor accessible public toilet would have a negative impact on older people, disabled people and pregnant women.	Make clear that ground floor uses on Catford Road should provide 'active frontages'. The existing ground floor accessible public toilet		

Appendix 1a: Major Town Centre Sites

Appendix 1a: Major Town Centre Sites												
↔ = Little or no relevance to protected characteristics		↑ = Positive impact upon protected characteristics				↓ = Negative impact upon protected characteristics						
Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group
	↑	↑	↑	↓	↑	↑	↑	↔	↓	Provision of a mix of new homes should help cater for different needs and increase access to assessable homes (Lifetime Homes and wheelchair accessible). Additional community and/or leisure uses could provide opportunities for all groups. The provision of ground floor 'active frontages' should improve safety and reduce fear of crime.	should be re-provided on the Civic Centre site.	
CLP Recommended Option 5: Plassy Road Island	↑	↑	↑	↑	↑	↑	↑	↑	↑	Opportunity to secure significant improvements in natural surveillance of	Ensure that public car parking on lower or upper floors is	Landowner/ developer +

**Appendix 1a: Major Town Centre Sites**

Appendix 1a: Major Town Centre Sites												
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Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group
										<p>streets and open spaces and improve community safety and reduce fear of crime.</p> <p>Additional community and/or leisure uses could provide opportunities for all groups.</p> <p>Provision of a mix of new homes should help cater for different needs and increase access to assessable homes (Lifetime Homes and wheelchair accessible).</p> <p>Additional public car parking spaces could be managed to prioritise use by those who need it</p>	<p>accessible by lift.</p> <p>Car park management plan to prioritise use by disabled people and those with children (See CLP Recommended Option 24).</p>	<p>LBL Planning</p>

**Appendix 1a: Major Town Centre Sites**

Appendix 1a: Major Town Centre Sites													
↔	= Little or no relevance to protected characteristics				↑	= Positive impact upon protected characteristics				↓	= Negative impact upon protected characteristics		
Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group	
										most.			
CLP Recommended Option 6: Former Catford Greyhound Stadium	↑	↑	↑	↑	↑	↑	↑	↑	↔	↔	<p>Opportunity to secure significant improvements to the railway station environment and improved east-west pedestrian connectivity.</p> <p>Provision of a mix of new homes should help cater for different needs and increase the number of accessible homes (Lifetime Homes and wheelchair accessible).</p> <p>Additional community and/or leisure uses could provide opportunities for key groups.</p> <p>The proposed new</p>	Need to ensure that a future bridge over existing railway line near Holbeach Road is as accessible as possible.	Landowner/ developer + LBL Planning

**Appendix 1a: Major Town Centre Sites**

Appendix 1a: Major Town Centre Sites												
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Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group
										pedestrian bridge linking the site with Holbeach Road cannot be practically and viably provided as a step-free bridge. However, it should be designed to be as accessible as possible and would benefit a range of protected characteristics.		
CLP Recommended Option 7: Wickes and Halfords	↑	↑	↑	↑	↑	↑	↑	↔	↔	Opportunity to secure significant improvements to the attractiveness and safety of Waterlink Way. Provision of a mix of new homes should help cater for different needs and	Need to require appropriate car parking for all proposed uses (not just retail and commercial uses).  Car park management plan to prioritise use by	Landowner and LBL Planning

**Appendix 1a: Major Town Centre Sites**

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Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group
										increase access to assessable homes (Lifetime Homes and wheelchair accessible). Additional community uses could provide opportunities for key groups. Additional public car parking spaces could be managed to prioritise use by those who need it most.	disabled people and those with children (See CLP Recommended Option 24).	

## Appendix 1b: Town Centre-wide Policies

Further Option	Gender	Race	Disability	Age	Sexuality	= Little or no relevance to equalities group				Potential for impact	Preventative / mitigation measures required	Responsible group
						Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity			
CLP Recommended Option 8: Presumption in favour of sustainable development	↑	↑	↑	↑	↑	↑	↑	↑	↑	The guiding principles of sustainable development cover environmental, economic and social considerations, together with promoting good governance.  Securing sustainable development would have a positive impact on all groups.	n/a	n/a
CLP Recommended Option 9: Providing new homes	↑	↑	↑	↑	↔	↔	↔	↔	↑	Provision of a mix of new homes should help cater for different needs and increase access to assessable homes (Lifetime Homes and wheelchair accessible).	n/a	n/a



**Appendix 1b: Town Centre-wide Policies**

<div style="display: flex; justify-content: space-between; align-items: center;"> <span>↔ = Little or no relevance to equalities group</span> <span>↑ = Positive impact upon equalities group</span> <span>↓ = Negative impact upon equalities group</span> </div>												
Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group
CLP Recommended Option 10: Economic growth for Catford	↑	↑	↑	↑	↔	↔	↔	↔	↔	Additional employment generating uses and associated job and training opportunities would benefit key groups.	Develop policy option to include requirement for the design of all new non-residential development to be designed in accordance with London Plan Policy 7.2 (An Inclusive Environment).	Landowner/ developer + LBL Planning
CLP Recommended Option 11: Mixed use	↑	↑	↑	↑	↑	↑	↑	↔	↔	The provision of a mix of uses on sites should improve natural surveillance of streets and other spaces throughout the day.  The provision of ground floor 'active frontages' should improve safety and	n/a	n/a

**Appendix 1b: Town Centre-wide Policies**

<div style="display: flex; justify-content: space-between; align-items: center;"> <span>↔ = Little or no relevance to equalities group</span> <span>↑ = Positive impact upon equalities group</span> <span>↓ = Negative impact upon equalities group</span> </div>												
Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group
										reduce fear of crime.		
CLP Recommended Option 12: Employment uses	↑	↑	↑	↑	↔	↔	↔	↔	↔	Additional employment generating uses and associated job and training opportunities would benefit key groups.	Develop policy option to include a reference to ensuring that at least 10per cent of bedrooms are wheelchair accessible (in accordance with London Plan Policy 4.5).	Landowner/ developer + LBL Planning
CLP Recommended Option 13: Town Centre vitality and viability	↑	↑	↑	↑	↑	↑	↔	↔	↔	The street market is particularly relevant for BAME groups and its retention is positive. The provision of ground floor 'active frontages' should improve safety and reduce fear of crime.	n/a	n/a

## Appendix 1b: Town Centre-wide Policies

Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group
CLP Recommended Option 14: Evening economy uses	↔	↔	↔	↔	↔	↔	↔	↔	↔	Unlikely to have any significant impact on any particular equalities group.	n/a	n/a
CLP Recommended option 15: Restaurants, cafes and drinking establishments	↔	↔	↔	↔	↔	↔	↔	↔	↔	Unlikely to have any significant impact on any particular equalities group.	n/a	n/a
CLP Recommended Option 16: Hot food takeaway shops	↔	↔	↔	↑	↔	↔	↔	↔	↔	The proposal to limit new take-aways within 400m of primary or secondary schools should have a positive impact on the health of young people.	n/a	n/a
CLP Recommended Option 17: Shopfronts, signs and hoardings	↑	↑	↑	↑	↑	↑	↔	↔	↑	Ensuring that suitable access is provided for disabled people should	n/a	n/a

**Appendix 1b: Town Centre-wide Policies**

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Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group	
										help this group, together with older people, parents/carers and pregnant women. The sensitive design of grilles and shutters should help reduce the fear of crime			
CLP Recommended Option 18: Carbon dioxide emission reduction and decentralised energy networks	↔	↔	↔	↔	↔	↔	↔	↔	↔	Unlikely to have any significant impact on any particular protected characteristics.	n/a	n/a	
CLP Recommended Option 19: Adapting to climate change	↔	↔	↔	↔	↔	↔	↔	↔	↔	Unlikely to have any significant impact on any particular protected characteristics.	n/a	Na/	

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Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group
CLP Recommended Option 20: Managing and reducing the risk of flooding	↔	↔	↓	↓	↔	↔	↔	↔	↓	The Catford Centre and Milford towers, Civic centre, Laurence House and Wickes and Halfords sites are vulnerable to flood (parts of each of these sites are within Flood Zone 3a High Probability). This may require development to be raised above existing ground level and/or raise particular concern and challenges for groups who are less mobile or who have dependents.	Core Strategy Policy 11 requires major development proposals to be supported by a Flood Risk Assessment. These will enable LBL Planning in liaison with the Environment Agency to ensure, where necessary, that ground floors are set at an appropriate level, a safe exit route/refuse is provided and an appropriate evacuation plan is in place.	LBL Planning + Environment Agency
CLP Recommended Option 21: Design and public realm	↑	↑	↑	↑	↑	↑	↔	↔	↑	Opportunity to secure significant improvements in the legibility,	Develop policy to explicitly require all changes to the public	Landowner/ developer + LBL Planning.

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Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group
										accessibility and safety of the public realm, to enhance public transport and to significantly reduce severance.	realm result in a more inclusive and safer environment for pedestrians, cyclists and public transport users and to reduce community severance.  Develop policy option to ensure that, where appropriate, the design of new spaces includes opportunities for people to socialise and play.	
CLP Recommended Option 22: Tall buildings	↔	↔	↓	↓	↔	↔	↔	↔	↓	Tall buildings can create windy and/or shady areas that make walking or sitting unattractive – having a negative impact	Develop policy option to ensure that the wind and shadow environment of amenity space around tall buildings is	Landowner/developer + LBL Planning

**Appendix 1b: Town Centre-wide Policies**

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Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group	
										on disabled people, older and young people and pregnant women.	comfortable for walking and sitting.		
CLP Recommended Option 23: Heritage assets	↔	↔	↔	↔	↔	↔	↔	↔	↔	Unlikely to have any significant impact on any particular protected characteristics.	n/a	n/a	
CLP Recommended Option 24: Sustainable transport	↔	↔	↑	↑	↑	↑	↔	↔	↑	Opportunity to secure significant improvements in the legibility, accessibility and safety of the public realm, reduce severance, improve walking and cycling facilities, enhance public transport and improve car parking provision for a number of groups.	Require Car Park Management Plans for all proposed public car parking to demonstrate how the design and management of spaces would prioritise disabled people and those with children.	LBL Property and LBL Planning	

## Appendix 1b: Town Centre-wide Policies

Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group
CLP Recommended Option 25: Social infrastructure	↑	↑	↑	↑	↔	↔	↔	↔	↔	The provision of additional infrastructure to keep pace with growth would have a positive impact on key groups.	Develop policy option to include requirement for the design of all new social infrastructure to be designed in accordance with London Plan Policy 7.2 (An Inclusive Environment).	LBL Planning + relevant private, public + voluntary groups.
CLP Recommended Option 26: Implementation	↑	↑	↑	↑	↑	↑	↑	↑	↑	The implementation of policies should have a positive impact on all groups.	n/a	n/a
CLP Recommended Option 27: Monitoring	↑	↑	↑	↑	↑	↑	↑	↑	↑	The monitoring of policies should enable progress to be measured and adjustments made – resulting in a positive	The delivery, implementation and monitoring framework to be included in the Proposed Submission	LBL Planning



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Further Option	Gender	Race	Disability	Age	Sexuality	Gender re-assignment	Faith	Marriage / civil p'ship	Pregnancy / maternity	Potential for impact	Preventative / mitigation measures required	Responsible group
										impact on all groups.	Version of the Catford Plan (referred to in Appendix 2) should include criteria/indicators that help monitor possible impacts on protected characteristics.	